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I-81 CORRIDOR IMPROVEMENT STUDY

Scoping Summary Report

Tier 1 Environmental Impact Statement

Scoping Summary Report

I-81 Corridor Improvement Study
Tier I Environmental Impact Statement

May 2004

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1 Introduction

1.1 Introduction

To comply with the National Environmental Policy Act (NEPA), the Federal Highway Administration (FHWA), in cooperation with the Virginia Department of Transportation (VDOT), is preparing a Tier 1 Environmental Impact Statement (EIS) for the I-81 Corridor Improvement Study in Virginia. The tiering, or phasing, of the NEPA process is a flexible approach included in the Council on Environmental Quality's (CEQ's) *Regulations For Implementing The Procedural Provisions of the National Environmental Policy Act* (NEPA) and in FHWA's environmental regulations that allows broad discretion on issues to be addressed in first and second tier NEPA documents. FHWA and VDOT believe that tiering is the best approach for the I-81 Corridor Improvement Study to comply with NEPA, since it is the most efficient method to address corridor-wide issues, such as tolling and mode choice, in a Tier 1 EIS. The Tier 1 EIS will be the vehicle for a fact-based analysis so that informed decisions can be made on these corridor-wide issues .

The *Process Streamlining Agreement Between the Virginia Department of Transportation and the Federal Highway Administration on the Interstate 81 Corridor National Environmental Policy Act Process* (Process Agreement) defines the decisions to be made and the approvals to be granted at specific milestones of the tiered environmental study and defines the study process and elements to be included in each stage of the tiered analysis. A traditional tiered approach will be used, consisting of a Tier 1 Draft EIS, a Tier 1 Final EIS, and a Tier 1 Record of Decision (ROD) from FHWA to conclude Tier 1. The Tier 1 process will define the issues to be addressed in further Tier 2 environmental studies, if a "Build" Improvement Concept is selected. Upon completion of the Tier 1 study, decisions will be made on:

- the potential improvement concepts;
- modal choice;
- operational concepts (for example, separation of automobiles and trucks);
- advancing I-81 as a toll pilot under Section 1216(b) of ;
- projects with independent utility and logical termini to be studied in Tier 2;

- the levels of Tier 2 NEPA document(s); and
- the location of the corridors for studying future highway and rail alignments in the Tier 2 NEPA documents.

Subsequent Tier 2 NEPA documents prepared for independent projects identified during Tier 1 would then address more site-specific details using the normal NEPA process consistent with a second tier study.

Scoping is an early, open, and on-going process used to determine the range of improvement concepts, issues, and impacts that the Tier 1 EIS will address in accordance with NEPA. The Scoping process includes the general public as well as the appropriate federal, state, regional, and local agencies.

An Agency Scoping Meeting was held on February 3, 2004 in Richmond, Virginia. A total of 16 federal, state, regional, and local agency representatives attended the agency meeting. A Scoping Information Package (Appendix A) was distributed at the meeting. Appendix D includes the minutes of the Agency Scoping Meeting and Appendix F includes the Agency Scoping Comments.

Public and agency scoping meetings are the primary means of capturing the issues of importance. Seven public scoping meetings were held on February 10, 11, 12, and 17, 2004 in various locations along the study corridor. Specifically, public scoping meetings were held in Abingdon and Wytheville, Virginia on February 10, 2004, in Christiansburg and Salem, Virginia on February 11, 2004, in Lexington and Harrisonburg, Virginia on February 12, 2004, and in Winchester, Virginia on February 17, 2004. A newsletter (Appendix B) that described the I-81 Corridor Improvement Study, tiering, and the decisions to be made at the conclusions of Tier 1 was distributed prior to and at the public scoping meetings.

On display at the public scoping meetings was information pertaining to the I-81 corridor, the study schedule, and the purpose of the study (see Appendix C). An open-house format was used consisting of a repeating PowerPoint presentation with accompanying presentation boards. VDOT and FHWA representatives were present to discuss the study and answer any questions. Before the public scoping meetings, the Virginia Department of Transportation (VDOT) held briefings with local elected officials at each of the seven public locations to inform them of the process and to receive any comments they may have.

A total of 358 people attended the seven public scoping meetings, including 13 people in Abingdon, 34 in Wytheville, 30 in Christiansburg, 67 in Salem, 115 in Lexington, 31 in Harrisonburg, and 68 in Winchester.

The scoping process yielded approximately 1,100 comments, dated on or before the closing date of February 27, 2004 for the scoping comment period. However, since scoping is continuous and on-going, FHWA and VDOT will be accepting scoping comments throughout the study period.

There were approximately 244 different commentors, as listed in Appendix E. Most of these were private citizens. A total of 21 federal, state, regional, and local agencies provided comments. The remaining comments were from industry and interest groups.

There were four sources of scoping comments: verbal comments made at the scoping meetings, comments made on the comment forms available at the scoping meetings, comments from scoping letters, and comments provided by e-mail. The highest number of commentors (approximately 198) used the comment forms to provide input.

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Prevailing or Major Scoping Issues

2.1 Introduction

Prevailing or major issues raised during the Scoping process are grouped into six major topical categories: Transportation, Improvement Concepts, Tolls, Environmental, Implementation, and Process. These six topics are further divided into subtopics.

The Tier 1 EIS will address many of the issues and concerns that were raised. However, there are a few issues that will not be addressed in the Tier 1 EIS because they are more appropriately addressed in Tier 2 studies that may result. A smaller group of issues are outside the scope of the NEPA EIS process entirely (*i.e.*, beyond the scopes of the Tier 1 EIS and potential Tier 2 NEPA documents). The manner in which the comments have been addressed is discussed in the following italicized paragraphs.

2.2 Transportation

Transportation issues raised during the Scoping process include:

2.2.1 Purpose and Need Issues

- Desire for the Purpose and Need Statement to have goals and objectives that include identification of safety improvements, reduction of truck traffic, reduction in growth of per capita vehicle miles traveled in the I-81 corridor and surrounding region, and identification of transportation demand management and land use approaches that reduce traffic.

The discussion of the Purpose of and the Need for the study will be in accordance with FHWA's Technical Advisory T 6640.8A, dated October 30, 1987, titled Guidance for Preparing and Processing Environmental and Section 4(f) Documents. The Purpose and Need discussion will be a fact-based analysis that identifies and describes the transportation problem(s) or needs which the study is intended to address. Some of the above elements may be included as part of the study's Purpose and Need. For example, corridor-wide improvement concepts may include a number of Transportation Demand Management and Transportation System Management strategies.

The Tier 1 EIS will evaluate improvement concepts that meet the study's Purpose and Need and that would divert truck to rail and would determine vehicle miles traveled for the No Build and Build Improvement Concepts. However, because I-81 is part of the interstate system of highways, reduction of truck traffic and reduction in growth of per capita vehicle miles travel will not be included as part of the study's Purpose and Need. It may, however, be a result of the selected improvement concepts.

City and County officials are responsible for control of land use in Virginia, primarily through local and county comprehensive plans. Because neither FHWA, nor VDOT have control over land use, the study's Purpose and Need will not specifically include land use approaches that reduce traffic. However, the Tier 1 EIS will assess the general consistency of the improvement concepts with the comprehensive plans adopted for the area and (if applicable) other plans used in the development of the transportation plans for metropolitan areas. Where possible, the distinction between planned and unplanned growth will be identified based on coordination with local governments and/or Planning District Commissions.

- Need for the Purpose and Need Statement to provide documentation of the safety problem and its causes.

The Purpose and Need analysis will discuss roadway and segment accident history and describe the nature of the study area safety deficiencies.

- Inclusion in the study's Purpose and Need of the goals and objectives of protection and enhancement of the scenic beauty, historic character, downtown communities and economies, the agricultural economy and the environment of the Shenandoah Valley and the entire corridor from Maryland to Tennessee.

The Tier 1 EIS will discuss the presence of sensitive visual resources, historic resources, and farmlands in the I-81 corridor and assess the potential of the improvement concepts to affect these resources. It will also include a socioeconomic analysis that identifies beneficial and adverse impacts to communities. However, since these issues are not elements of a transportation problem or need, they will not be included in the Purpose and Need discussion.

- Desire for the Purpose and Need to include the goal of minimizing energy consumption and dependence on petroleum fuels.

The Tier 1 EIS will include a brief comparison of the energy demands from the roadway improvement concepts and from the rail improvement concepts but, since this issue is not an element of the transportation problem or need, it will not be included in the Purpose and Need discussion.

- Determination whether long-haul truck traffic is creating the need for the proposed I-81 improvements.

The traffic analysis for the Tier 1 EIS will include an origin-destination survey that will provide valuable information regarding length of trips and the origin and destination of trips along the interstate highway network in the I-81 study area. The Purpose and Need discussion will include some of this information.

2.2.2 Transportation Safety Issues

- Need for increased enforcement or adjustments to existing traffic operation regulations (such as lower posted speed limits for trucks or prohibiting truck use of the left lane) on I-81 or need for adjustments to motorist regulations (such as increased driver rest and break requirements).

The I-81 Corridor Improvement Study will identify deficiencies throughout the corridor, develop a range of potential solutions, and evaluate those solutions. Additional enforcement is not included as part of the study's Purpose and Need because the funding for this effort is from other sources in the Commonwealth and is outside VDOT's jurisdiction.

On April 14, 2004, Governor Mark Warner signed a bill, effective July 1, 2004, that prohibits trucks from the left-most lane along segments of I-81 having more than two lanes in each direction. The bill also requires commercial motor vehicles to stay in the right-most lane if driving at least 15 miles per hour or more below the posted speed limit on I-81, when there are no more than two lanes in each direction.

Comparison of I-81's accident rate with other Interstates in the country and projection of future accident rates along I-81, especially for improvement concepts involving rail.

The safety analysis will compare I-81's accident rate with other Interstate highways in Virginia. Also, the Tier 1 EIS will summarize future traffic operation characteristics of each improvement concept. These characteristics include the general ability of the improvement concepts to improve safety, based upon estimates of vehicle miles travelled and current highway accident rates.

2.2.3 Traffic Modelling/Forecast Issues

- Need for the Study to use up-to-date traffic counts and modeling.

Collection of updated vehicle counts is included as part of the I-81 Corridor Improvement Study. Modeling will be a synthesis of existing information that includes extrapolation of output from existing travel demand models in use in the corridor.

- Desire for separate traffic growth rates to be generated for each improvement concept.

Traffic growth rates will be based on the most recent land use and socioeconomic data from the Metropolitan Planning Organizations in the corridor, input from state and local officials about future land use changes along the corridor, statewide and regional economic forecasts, and information developed for the statewide model. The horizon year for the traffic analysis is 2035, which is beyond the horizon year for local comprehensive plans. Furthermore, the corridor is rural. A significant difference in traffic growth rates among improvement concepts is, therefore, unlikely and the generation of separate growth rates for each improvement concept is unnecessary.

- Desire for the Study to examine a variety of future land use scenarios and their impact on traffic demand.

The preceding paragraph discusses how the I-81 Corridor Improvement Study will consider land use in the corridor as a factor in determining traffic demand. The study will use significant land use changes, economic and demographic variables, in conjunction with the analysis of freight diversion

options and the effects of tolling strategies, to develop up to twelve corridor traffic forecasts. The study will not examine various future land use scenarios, however.

- Consideration of the impact that proposed I-74 will have on both I-81 and I-77.

The traffic analysis will consider fully funded capital improvements in VDOT's Six Year Improvement Plan and capital improvements in the Long Range Transportation Plans. Since proposed I-74 is not included in anyof these plans, it will not be included as part of the traffic analysis. If a "Build" Improvement Concept is selected in Tier 1, the status of I-74 would be reexamined and reconsidered, if necessary, during Tier 2.

- Desire for the study area to encompass I-95 and its parallel CSX rail corridor on the east, and comparable corridors to the west.

The current scope of the traffic analysis for the I-81 Corridor Improvement Study defines the traffic study area as the I-81 corridor including I-81's interchanges with cross streets. Route 11, which is parallel to I-81 for its entire length in Virginia, is also in the traffic study area. As part of the traffic analysis, traffic volumes that divert to Route 11 to avoid tolls, as well as any potential roadway improvements along Route 11 that may result from these changes in traffic volumes, would be determined. Traffic volumes that divert to other roadways beyond the current traffic study area to avoid tolls will also be quantified, but any potential roadway improvements that would be required as a result of the diverted traffic to these roadways would be studied separately as part of the ongoing statewide transportation planning process. These potential roadway improvements would be developed as independent design and construction projects. It is, therefore, not necessary to expand the traffic study area for the I-81 Corridor Improvement Study beyond its current definition.

2.2.4 Induced/Diverted Traffic Issues

- Determination whether improvement concepts that add lanes to I-81 divert or induce more traffic over the long term and determination of the safety impacts, if any, of additional traffic (particularly trucks) on I-81.

The preceding paragraphs discuss how the I-81 Corridor Improvement Study will determine future traffic demand. As previously stated, the traffic analysis will determine traffic diversions to other roadways. Also, the Tier 1 EIS will discuss the ability of the improvement concepts to improve safety on I-81.

- Identification of roadways to which the I-81 motorists would be diverted by tolls as well as the determination of the Levels of Service on those roadways and effects on safety. Similarly, the concern about impacts from traffic that diverts to local parallel roadways as a result of construction on I-81.

As previously discussed, traffic volumes diverted, by tolls, to other roadways will be determined. The analysis of future traffic conditions will determine the levels of service on the roadways in the currently-defined traffic study area and the general effects on safety, based upon estimates of vehicle miles travelled and current accident rates.

Impacts from motorists who divert to local parallel roadways as a result of on-going construction on I-81 is more appropriately addressed at the Tier 2 stage, when the specific roadway construction segments and traffic management during construction for those segments would be better defined.

2.2.5 Cost Issues

- Quantification of increased costs of upgrading and maintaining primary highways used by motorists diverting from I-81 to avoid tolls.

The Tier 1 EIS will include preliminary order-of-magnitude construction cost estimates for each improvement concept and for any potential roadway improvements along Route 11 that may result from changes in traffic volumes. However, potential improvements to any other roadways that may be studied as a result of changes in traffic volumes would be developed separately as part of the ongoing statewide transportation planning process. Cost estimates for construction of these roadway improvements would be determined at that time.

The following paragraph addresses the issue of potential increased maintenance costs.

- Consideration of savings in maintenance costs for each interstate truck-mile diverted to rail.

Any monetary benefit-cost analysis (BCA) would have to consider life-cycle benefits as well as life-cycle costs. However, as indicated in the CEQ regulations (40 CFR 1502.23), for purposes of complying with NEPA, the merits and drawbacks of the various improvement concepts need not be displayed in a monetary BCA, and typically are not, especially when there are other important considerations that are relevant to a decision.

2.2.6 Other Transportation Issues

- Development of improvement concepts that provide Level of Service B for the rural sections and Level of Service C for the urban sections through the year 2035.

The improvement concepts will be developed to meet the study's Purpose and Need and not necessarily to meet specific levels of service.

- Concern about the effects of traffic to Bristol from an expanded I-81 that ends at the Tennessee state line.

If travel lanes are added to I-81 in Virginia before travel lanes are also added to I-81 in Tennessee, there would have to be an appropriate lane transition near the state line. The traffic analysis for the Tier 1 EIS will determine the effect of this lane transition on traffic operations. The specific location and design of the lane transition would occur in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

- Determination whether increased use of railroads to move freight will reduce the amount of fuel consumed for freight transportation.

The Tier 1 EIS will include a brief comparison about the energy impacts of the improvement concepts. The comparison will distinguish between the energy demands of the roadway improvements and the energy demands of the rail improvements.

2.3 Improvement Concepts

Improvement concepts were divided into roadway improvement concept issues and rail improvement concept issues.

2.3.1 Roadway Improvement Concept Issues

- The following elements were suggested to be included in the roadway improvement concepts along the I-81 corridor:
  - Safety upgrading (not necessarily involving widening).
  - Additional travel lanes, especially in the most congested areas.
  - Separation of trucks and passenger vehicles.
  - Additional truck climbing lanes.
  - Increased use of Intelligent Transportation System technologies along I-81 to improve motorist safety.
  - Additional and improved rest areas.
  - Consideration of park and ride facilities with bus service.

These elements will be included if they help the improvement concepts meet the study's Purpose and Need.

- There were also suggestions for roadway improvement concepts on new location as follows:
  - Removal of the I-81/I-77 overlap by rerouting I-77 or I-81 to follow the Pepper's Ferry Road corridor then connecting back northwest of Wytheville.
  - A separate parallel four- to six-lane interstate highway from near the Tennessee state line to north of Abingdon. Existing I-81 would be designated Business I-81 and the new interstate would be primarily for through traffic.
  - An alternate corridor for heavy truck traffic, possibly a new interstate between I-81 and I-95.

The first two roadway improvement concepts on new location are within the currently defined traffic study area and may be considered, depending upon the results of the traffic analysis. However, as discussed in Section 2.2.3, it is not necessary to expand the traffic study area for the I-81 Corridor Improvement Study beyond its current definition. A new interstate between I-81 and I-95 is, therefore, outside the scope of Tier 1 and Tier 2.

Other roadway improvement concept issues included:

- Need for improvements to local roadways, such as Route 11, that may experience higher volumes as a result of changes to the I-81 corridor.

The analysis of future traffic conditions will determine the levels of service on the roadways in the currently-defined traffic study area as well as potential roadway improvements along Route 11 that may result from changes in traffic volumes. However, potential improvements to any other roadways that may be studied as a result of changes in traffic volumes would be developed separately as part of the ongoing statewide transportation planning process.

Several specific elements, as listed below, are more appropriately included in Tier 2, if a "Build" Improvement Concept is selected in Tier 1, because they involve advancing the design beyond the conceptual engineering that will be performed in Tier 1 and are not Tier 1 decisions as defined in the Process Agreement:

- Desire for the I-81 median to be used to accommodate additional lanes, rather than expanding the right-of-way. Similarly, consideration of an elevated roadway within the existing right-of-way for through traffic with intermittent interchanges.
- Improvements to existing interchanges (such as longer acceleration and deceleration lanes)
- Additional interchanges to alleviate traffic on local roadways and other existing interchanges.
- Collector-distributor roadways, especially in urban areas.
- Improved pavement markings and provision of rumble strips.
- Incorporation of existing and planned bike trails in the area and inclusion of bicycle facilities crossing I-81.
- Preservation or improved accessibility of non-motorized traffic (pedestrians, bicycles, horses, and buggies).

There was also interest in the selection of the No-Build Concept as well as a suggestion for a separate improvement concept comprised of VDOT's current plans and projects, approved by the Commonwealth Transportation Board.

The No-Build Concept in the Tier 1 EIS will include short-term minor restoration types of activities that maintain continuing operation of the existing roadway, fully funded capacity improvement projects in VDOT's Six-Year Improvement Plan, and Transportation System Management measures.

2.3.2 Rail Improvement Concept Issues

Issues about Rail Improvement Concepts raised during the Scoping process include:

- Desire for an improved high-speed rail system in the I-81 corridor that would carry both passengers and freight. For freight, this could be a "steel interstate" where Norfolk Southern's lines parallel to I-81 are double or triple tracked with five intermodal stops at major intersections along the route.

The traffic analysis will consider the needs of both passenger and freight corridor users. Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors).

- Need for the rail improvement concept(s) to extend beyond the entire length of I-81 to connect with the states to the north and south to be effective.

Capital investments in the rail corridor are required to improve service speed and terminal access to make rail intermodal services competitive, and to expand capacity in order to handle additional traffic as it is diverted. The Northeast-Southeast Midwest Corridor Marketing Study by Reebie Associates, commissioned by the Virginia Department of Rail and Public Transportation, studied freight diversion from I-81 under two broad scenarios: 1) a Virginia-based strategy, and 2) a corridor-wide strategy, which would involve improving rail infrastructure in twelve other states from New York to Texas. The results of the market research and detailed competitive analysis completed for this study suggest that the Virginia-based strategy of investments would produce a moderate amount of traffic diversions. It also indicates that Virginia-based investments work best as a first step toward a corridor-wide program. The Northeast-Southeast Midwest Corridor Marketing Study further indicates that, even if all the envisioned out-of-state improvements were implemented, they would still not obviate the need for transportation improvements along the I-81 corridor in Virginia.

However, implementation of the rail improvements is challenging. Federal-aid highway funding categories cannot be used to implement privately owned rail improvements as part of this study, and any toll revenues received under Section 1216(b) of TEA-21 cannot be used to fund rail improvements. Any improvements to privately owned railroads are outside FHWA's jurisdiction and at the discretion of the railroad companies.

Furthermore, it is not reasonable and practical to conduct a NEPA analysis for rail improvements in numerous other states that FHWA and the Commonwealth of Virginia cannot implement. Each state is different, with different requirements, different processes, different governmental bodies, and different needs. For rail improvements to be implemented in a particular state, that state would have to conduct its own analysis and make decisions based on the rail needs of the particular state. Based on the above, spending public dollars to conduct a NEPA analysis for out-of-state rail improvements as part of the Tier 1 EIS is not in the best overall public interest. This conclusion will, as appropriate, be revisited and confrimed as the study progresses.

Nevertheless, the inclusion in the Tier 1 EIS of an evaluation of rail improvement concepts in Virginia only to determine their ability to meet the transportation needs is a reasonable approach to fulfilling CEQ's requirement to study improvement concepts outside FHWA's jurisdiction, while at the same time fulfilling Congress' direction to make decisions in the best overall public interest. Included in this analysis will be the existing Piedmont and Shenandoah rail lines that parallel I-81 in Virginia. The Tier 1 EIS will also reference the Northeast-Southeast Midwest Corridor Marketing Study with regard to out-of-state rail.

- Suggestion to consider the Piedmont railroad corridor and the connection from Lynchburg to Roanoke for the rail improvement concept(s).

This issue is addressed in the response to the issue discussed in the previous bullet.

- Concern about the operational feasibility of the rail improvement concept(s).

The Tier 1 EIS will use the findings of several previous and ongoing studies performed for VDOT and the Virginia Department of Rail and Public Transportation about the effectiveness and feasibility of rail improvement concepts.

2.4 Tolls

The Scoping comments about tolls deal with toll policy and toll structure issues, impacts from tolls, toll implementation issues, and other issues related to funding.

2.4.1 Toll Policy/Structure Issues

- Indication of who will regulate and control the toll structure.

This issue is outside the scope of the Tier 1 EIS which will assess the impacts of tolls. Section 1216(b) of the Transportation Equity Act for the 21st Century (TEA-21) established a toll pilot program to allow conversion of a free Interstate highway to a toll facility. FHWA has given "conditional provisional approval" to VDOT to make I-81 a toll pilot facility. VDOT will be responsible for implementation and administration of the toll pilot. Section 1216(b) allows the states the flexibility to decide who and how much to toll.

- Suggestion that implementation of tolls be temporary.

This issue is outside the scope of the Tier 1 EIS. FHWA and VDOT will enter into an agreement that addresses the period of toll collections and the plan for the facility to become a free facility at the end of the toll collection time.

- Desire for toll structure to include peak hour pricing.

This issue is outside the scope of the Tier 1 EIS. However, VDOT would have to provide verification to the FHWA that all Metropolitan Planning Organizations along the I-81 corridor have been consulted about VDOT's approach to tolling on I-81. Also, VDOT would have to develop a plan outlining how it will ensure that the interests of local, regional, and interstate travelers, as it relates to tolling, are included as part of the public review processes.

- Desire for toll policies either to exempt Virginia-licensed motorists or to place a lower toll rate on them.

This issue is similar to the issue in the previous bullet and the same response applies.

- Clarification as to how future year revenues from tolls (beyond repayment of any private investor bonds) would be used.

This issue is outside the scope of the Tier 1 EIS or any Tier 2 NEPA documents. As part of the toll pilot project process, VDOT would have to develop a financial plan.

- Determination of the effect on future toll rates if traffic volumes are less than projected and toll revenues are less than expected.

This issue is discussed in the previous bullet.

- Desire for ability for tolls to be used for rail improvement concept as well as for I-81 construction and maintenance.

Section 1216(b) of TEA-21 does not allow toll revenue to be used to enhance rail capacity in the I-81 corridor. However, the Federal Railroad Administration's Railroad Rehabilitation Program may be an optional innovative financing approach.

2.4.2 Toll Impact Issues

- Determination of any impacts that tolls will have on economic development, agriculture, and tourism in Virginia.

The Tier 1 EIS will identify the general areas in the corridor where the transportation investment from the improvement concepts supports or affects public or private economic development plans. It would estimate the number of acres of prime and unique farmland or agricultural/forestal districts that may be affected in the general corridor and that would potentially be converted to other uses. Potential impacts to tourism resources would be generally described in terms of direct takings, changes in access, or obstructions of scenic viewsheds, if appropriate.

- Concern that truck tolls along I-81 will discourage development in western Virginia, and encourage development along other interstates that do not have truck tolls.

The Tier 1 EIS will involve coordination with affected local governments to solicit their input on identifying any potential changes to future land uses from the different improvement concepts.

- Concern that tolls are discriminatory since they make travel more difficult for the poor.

Toll policy/structure issues are discussed in Section 2.4.1. The Tier 1 EIS will contain a map indicating the location of low-income and minority populations in the study area, a summary of the impacts to these populations, and a determination whether these impacts are disproportionately high and adverse based on overall demographic information in the study area. If a "Build" Improvement Concept is selected in Tier 1, the Tier 2 process would identify any mitigation measures, as appropriate.

2.4.3 Toll Implementation Issues

- Desire for the use of Intelligent Transportation System technologies for tolls.
- Need for toll facilities to be located where they will not have an adverse impact on local highways.

If a "Build" Improvement Concept is selected in Tier 1, these issues would be more appropriately addressed in Tier 2, when the design of the improvement concepts have further advanced.

2.4.4 Other Funding Issues

- Investigation and development of innovative alternative funding methods to construct the roadway improvements without the use of tolls.
- Desire for increased fuel tax to fund all the proposed roadway improvements, rather than funding by tolls.
- Desire for federal and state transit subsidies for workers in the corridor and state and federal surcharges or funding to encourage longer distance freight to move to rail.

These issues are outside the scope of the Tier 1EIS or any Tier 2 NEPA documents.

2.5 Environmental

Environmental issues raised in the Scoping process include:

2.5.1 Air Quality Issues

- Quantification of ozone and fine particulate matter emissions from the improvement concepts.

The Tier 1 EIS will include a comparison of the improvement concepts' corridor-wide emissions (particulate matter and ozone precursors). These comparisons will be based on an estimated amount of emissions per mile for each concept. If a "Build" Improvement Concept is selected in Tier 1, a detailed air quality analysis will be conducted during Tier 2. Any individual projects would have to conform to the National Ambient Air Quality Standards (NAAQS) before they could be implemented.

- Identification of EPA-defined nonattainment areas in the Study Area and determination of the impacts that improvement concepts would have on future attainment goals.

The Tier 1 EIS will include documentation of the current air quality attainment status of the study area and discuss the relationship of the study to the State Implementation Plan (SIP) for air quality. If a "Build" Improvement Concept is selected in Tier 1, the assessment of ozone and fine particulate impacts from the improvement concepts in terms of conformity with the SIP would be assessed in detail during Tier 2. Any individual projects would have to comform to the NAAQS before they could be implemented.

- Concern about poor air quality leading to degradation of the viewshed.

The secondary NAAQS set limits on air pollutants to protect public welfare, including protection against decreased visibility. Because the improvement concepts would need to be further advanced before the appropriate air quality analyses can be conducted, the ability of the improvement concepts to meet the NAAQS would be addressed in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

- Consideration of topographically-induced air inversions.

Topographically-induced air inversions are naturally occurring. All projects in air quality non-attainment areas must conform to the NAAQS before they can be implemented. The air quality conformity analysis for individual projects would occur during Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

- Consideration of the effect of traffic on public health.

The primary NAAQS set limits on air pollutants considered harmful to public health. Because a microscale analysis is needed to determine if the NAAQS are met and because the design of the improvement concepts would need to be further advanced before a microscale air quality analysis can be conducted, the ability of the improvement concepts to meet the NAAQS would be addressed in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

2.5.2 Cultural Resource Issues

- Desire for preservation of historic homesteads and farms, specifically McCormick Farm.
- Concern about impacts from improvement concepts on farmhouses, barns, mills and churches developed by colonists along an ancient Native American trail which follows I-81.
- Consideration of historic crossroads of the 18th and 19th centuries.
- Desire for preservation of Civil War battlefields in the corridor. Specifically, the Valley Campaigns of 1862 and 1864, including the New Market, Cross Keys, and Port Republic battlefields and the battlefields of the Shenandoah Valley National Battlefields Historic District, including 2nd Winchester, 3rd Winchester, Cedar Creek, Fisher's Hill. There was also a concern for a Civil War campsite east of Wytheville used by Confederate Cavalry defending the railroad.
- Desire for preservation of stonework associated with the Valley Railroad.

The Tier 1 EIS will have maps and tables that list the historic sites along the corridor and a summary of the potential for the improvement concepts to affect historic properties. This information will be used to help make recommendations on the corridor-wide decisions that need to be made in Tier 1. If a "Build" Improvement Concept is selected in Tier 1, the formal Section 106 process for individual projects, involving identification of historic properties, assessment of adverse effects, and resolution of any adverse effects, would occur in Tier 2. During the formal Section 106 process, there would be consultation with the State Historic Preservation Officer, the Advisory Council in Historic Preservation, and other parties with an interest in the effects on historic properties, to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties.

2.5.3 Land Use Issues

- Desire for the preservation of farmland and open space.

The Tier 1 EIS will identify impacts to farmland and open space. If a "Build" Improvement Concept is selected in Tier 1, these impacts would be avoided, minimized, and mitigated, to the extent practical, in Tier 2 when the design of the improvement concepts has further advanced.

- Concern about sprawl and other land use changes as a result of improvement concepts.

City and County officials are responsible for control of land use in Virginia, primarily through local and county comprehensive plans.The Tier 1 EIS will assess the general consistency of the improvement concepts with the comprehensive plans adopted for the area and (if applicable) other plans used in the development of the transportation plans for metropolitan areas. Where possible, the distinction between planned and unplanned growth will be identified based on coordination with local governments and/or Planning District Commissions.

- Desire to minimize residential takings and construction effects on residential areas from improvement concepts.

VDOT will attempt to minimize residential and commercial takings to minimize construction effects to residential areas. However, if a "Build" Improvement Concept is selected in Tier 1, this particular issue is more appropriately addressed at the Tier 2 stage, when the specific roadway construction segments and traffic management during construction for those segments would be better defined.

2.5.4 Natural Resource Issues

- Concern about impacts to watersheds, especially the Shenandoah River watershed and the Chesapeake Bay watershed.

Existing GIS and hard copy mapping sources from localities, Planning District Commissions, state and federal sources will be used to identify and map wetlands, water bodies, stream segments, Sole Source Aquifers, 100-year floodplains, and watershed boundaries. The broad-scale analysis in Tier 1 will result in an estimate of impacts to these water resources along the entire corridor segregated by large watershed. Watershed management information available on-line from EPA and Virginia DEQ will be reviewed to identify potential wetland and stream mitigation opportunities. If a "Build" Improvement Concept is selected in Tier 1, site-specific impact and mitigation analyses would be performed in Tier 2.

- Desire for preservation of wetlands.

The wetlands analysis in Tier 1 will identify the types and quality of the major wetland systems in the study area, based on National Wetland Inventory mapping, Natural Resources Conservation Service maps, and a windshield survey. It will include a description and tabular summary of the total estimated wetland acreage affected by the improvement concepts. The analysis will also evaluate general concepts to avoid or minimize harm to wetlands and identify general wetland mitigation concepts. If a "Build" Improvement Concept is selected in Tier 1, Tennessee Valley Authority, Section 404, Section 401, Section 402, Virginia Marine Resources Commission Subaqueous Bed, or Section 10 permitting procedures would be complied with in Tier 2.

- Concern for construction effects on Karst topography and the potential for sinkholes in the corridor. Consideration of Karst topography and associated hydrology in the characterization of groundwater quality impacts.

The Tier 1 EIS will identify, describe, and map the areas in the study area with karst topography. It will also quantify the acres of these sensitive geologic resources potentially affected by each improvement concept.

- Concern that increased impervious surface by improvement concepts will disturb drainage patterns and result in erosion and contaminated stormwater runoff.
- Desire for coordination with appropriate local governments in the design and construction of regional stormwater management facilities along the corridor.

If a "Build" Improvement Concept is selected in Tier 1, these issues would be addressed in Tier 2 when the design of the improvement concepts is more advanced.

- Consideration for wildlife, including threatened and endangered species and their habitats. Special concern for potential habitat fragmentation and desire for wildlife crossings.

Since most of the improvement concepts will likely be within an existing interstate and railroad corridor, it is assumed that the potential for impacts to threatened and/or endangered terrestrial species will be minimal and that they are not likely to result in a jeopardy opinion. Nevertheless, the Tier 1 EIS will include a discussion of potential impacts to threatened or endangered species and designated and proposed critical habitat in the study area. Potential impacts to terrestrial communities as a result of fragmentation will also be qualitatively described in the Tier 1 EIS. If a "Build" Improvement Concept is selected in Tier 1, and if applicable, the issue of wildlife crossings is more appropriately addressed in Tier 2 because it requires advancing the design beyond the conceptual engineering that will be performed in Tier 1.

- Consideration of the damaging effects of invasive species and the benefits of landscaping with native species.

If a "Build" Improvement Concept is selected in Tier 1, this issue would be addressed in Tier 2 when the design of the improvement concepts is more advanced.

2.5.5 Parks, Recreation and Open Space Issues

- Desire for park preservation and coordination with parks. Specifically, consideration of the Shenandoah Valley National Battlefields Historic District Management Plan and the Shenandoah Valley Battlefields National Historic District Environmental Impact Statement.

These referenced documents will be reviewed and used for the purpose of discussing in the Tier 1 EIS the potential of the improvement concepts to affect this historic district. If a "Build" Improvement Concept is selected in Tier 1, the formal Section 106 process for individual projects, involving identification of historic properties, assessment of adverse effects, and resolution of any adverse effects on individual historic properties, would occur in Tier 2. During the formal Section 106 process, there would be consultation with the State Historic Preservation Officer, the Advisory Council in Historic Preservation, and other parties with an interest in the effects on historic properties, to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties.

- Desire for preservation of trails, such as the Appalachian Trail, a unit of the National Park System, at the Daleville and Groseclose interchanges.

The Tier 1 EIS will include an evaluation of the potential impacts of the improvement concepts on Section 4(f) properties and identify whether those impacts could have a bearing on the location decision. The Tier 1 EIS will also include a preliminary determination as to whether there are prudent and feasible alternative improvement concepts that avoid the use of Section 4(f) properties. This determination shall consist of possible planning to minimize harm to the extent that the level of information included in the Tier 1 EIS will allow and to not preclude opportunities to minimize harm at subsequent stages. If a "Build" Improvement Concept is selected in Tier 1, specific mitigation measures for impacts to Section 4(f) properties would be developed during the Tier 2 process when the design of the improvement concepts are further advanced.

- Emphasis on the value of parks and open space on tourism.

The Tier 1 EIS will identify important tourism resources within the corridor that may be affected by the improvement concepts. Potential impacts to tourism resources would be generally described in the Tier 1 EIS in terms of direct takings, changes in access, or obstructions of scenic viewsheds, if appropriate. If a "Build" Improvement Concept is selected in Tier 1, opportunities to avoid, minimize, and mitigate these impacts would be explored in Tier 2.

- Desire for the preservation of forests and open space, including open space easements.

Based on an overlay of the improvement concepts over available GIS information, the Tier 1 EIS will include general estimates of potential property takings from open space easements by each improvement concept. The Tier 1 EIS would also estimate the number of acres of agricultural/forestal districts that may be affected in the general corridor and that would potentially be converted to other uses. If a "Build" Improvement Concept is selected in Tier 1, measures to avoid, minimize, and mitigate impacts to these resources would be developed in Tier 2.

2.5.6 Social and Economic Issues

- Concern for the potential effects of improvement concepts on Old Order Mennonite communities in Rockingham County.

The Tier 1 EIS will include a discussion of potential beneficial and adverse impacts on all communities in the study area from the improvement concepts.

- Concern about potential impacts to businesses and landowners, including the economic development of vacant parcels adjacent to I-81 and potential relocation of businesses near interchanges.

The Tier 1 EIS will identify the general areas in the corridor where the transportation investment from the improvement concepts supports or affects public or private economic development plans. In addition, based on overlaying the improvement concepts over the available GIS information, the Tier 1 EIS will include a general estimate of the number of residences and businesses that the improvement concepts could potentially displace. It will also include a general discussion of replacement housing and a statement on relocation programs and federal legislation. If a "Build" Improvement Concept is selected in Tier 1, a Stage I Relocation Assistance Report would be prepared during the Tier 2 process.

- Determination of costs to Virginia-based businesses that use I-81 to transport their goods as a result of tolls. Similarly, concern about impacts to the freight industry in terms of extended delivery times, increased labor costs, and greater risk of in-transit damage, if freight were carried by rail.

The economic analysis in the Tier 1 EIS, in conjunction with the toll study and freight diversion projections, will evaluate the costs and benefits to the freight industry that may ensue from the improvement concepts.

- Consideration of environmental justice for low-income and minority populations, including potential for community fragmentation.

The Tier 1 EIS will contain a map indicating the location of low-income and minority populations in the study area, a summary of the impacts to these populations, and a determination whether these impacts are disproportionately high and adverse based on overall demographic information in the study area. If a "Build" Improvement Concept is selected in Tier 1, the Tier 2 process will identify any mitigation measures, as appropriate.

Through consultation with local and/or regional officials, the Tier 1 EIS will identify positive or negative effects that the improvement concepts will have on community cohesion.

- Concern about effects of potential population increases as a result of greater highway capacity.

The Tier 1 EIS will include an analysis that determines the potential effects on population from the proposed improvement concepts.

- Concern that there will not be sustainable business development in communities along this primary freight corridor.

The Tier 1 EIS will identify the general areas in the corridor where the transportation investment from the improvement concepts supports or affects public or private economic development plans.

- Concern about the preservation of rural qualities to attract tourism and effects on hotels and service-related businesses.

The Tier 1 EIS will identify important tourism resources within the corridor that may be affected by the improvement concepts. Potential impacts to tourism resources would be generally described in the Tier 1 EIS in terms of direct takings, changes in access, or obstructions of scenic viewsheds, if appropriate. If a "Build" Improvement Concept is selected in Tier 1, opportunities to avoid, minimize and mitigate these impacts would be explored in Tier 2.

2.5.7 Visual Resource Issues

- Discussion of potential impacts of highway lighting on night sky visibility, wildlife, natural systems, and area residents, especially astronomical facilities and programs.

The design of the roadway lighting system must be further advanced in Tier 2, if a "Build" Improvement Concept is selected in Tier 1, before this issue can be addressed.

- Desire to preserve the scenic integrity of the I-81 corridor, including rural character and mountain views.

The Tier 1 EIS will discuss the extent to which the improvement concepts potentially affect sensitive visual resources. If a "Build" Improvement Concept is selected in Tier 1, opportunities to develop the improvement concept to avoid, minimize, and mitigate impacts to sensitive visual resources would be explored in Tier 2.

2.5.8 Other Environmental Issues

- Need for the environmental information in the Tier 1 document to be more detailed in areas of new alignments, in areas of expanded rights-of-way, and in areas known to be under consideration for improvement from other studies.

The level of information that will be generated for this Tier 1 EIS will be less than the level of information in a traditional (Tier 2) EIS. This information will be used to help make recommendations on the corridor-wide decisions that need to be made in Tier 1.The Tier 1 EIS will include an evaluation of the potential impacts of the improvement concepts on sensitive environmental resources and identify whether those impacts have a bearing on the location decision.

The first level screening process will be based on criteria that may include planning level construction cost estimates, "fatal flaw" environmental characteristics, ability to improve safety, ability to address geometric deficiencies, and ability to accommodate future traffic demands. The fatal flaw environmental analyses at this point will be based on available information (GIS data and/or paper maps) to determine if a concept may potentially have significant environmental impacts to key resources, such as historic sites, threatened and endangered species, and wetlands. Some initial concepts will be eliminated from consideration at this screening. The others will advance to the next level of development (i.e., conceptual engineering).

Site-specific issues and physical impacts would be addressed in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

- Concern for impacts on global climate change and microscale air quality changes from the improvement concepts.

No national approach has yet been set in law or regulation, nor has EPA established criteria or thresholds for greenhouse gas emissions. Because a national strategy to address greenhouse gas emissions from transportation, and all other sectors, is still being developed, it is premature to implement policies that attempt to incorporate consideration of greenhouse gas emissions into transportation planning and project development processes and it is technically unfeasible to accurately model how negligible increases or decreases of CO emissions at a project scale would add or subtract to the carbon emissions from around the world. The scope of such an analysis, with any results being purely speculative, goes far beyond the disclosure of impacts needed to make sound transportation decisions.

If a "Build" Improvement Concept is selected in Tier 1, the design of the improvement concepts would need to be further advanced in Tier 2 before a microscale air quality analysis can be conducted.

- Implications for community emergency response departments and institutions in the corridor, particularly for hazardous spill and accident response services, and hospital capacity both for accidents and normal operation.

Through consultation with local and or regional officials, the Tier 1 EIS will identify positive or negative effects that the improvement concepts will have on community services.

- Concern for negative effects on James Madison University and Shenandoah University, which are adjacent to I-81.

Site-specific issues and physical impacts would be addressed in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

- Concern about acid rain.

The secondary National Ambient Air Quality Standards (NAAQS) set limits on air pollutants to protect public welfare, including protection against damage to crops, vegetation, and buildings. Because the improvement concepts would need to be further advanced before the appropriate air quality analyses can be conducted, the ability of the improvement concepts to meet the NAAQS would be addressed in Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

2.6 Implementation

Scoping comments about implementation can be categorized into scheduling/sequencing issues and funding issues. Cost issues are also discussed in Section 2.2.5.

2.6.1 Schedule/Sequencing Issues

- Definition of a realistic schedule for improvement concepts that add capacity to I-81.

The Tier 1 EIS is scheduled to be completed in mid-2005. It is impossible to predict the schedule for individual construction projects because it is not known which improvement concepts, if any, will be selected in Tier 1.

- For the rail/highway improvement concepts, suggestion that freight and rail component should be implemented first because they are more likely to have higher diversion rates if completed before increasing highway capacity. Similarly, suggestion that the focus of a high-speed rail solution should be from Front Royal to Manassas.

The end result of the I-81 Corridor Improvement Study is that the Commonwealth Transportation Board (CTB) and FHWA will make decisions on which improvement concept, if any, merits further study. The specific phasing of construction of any improvement concept will require public policy decisions.

2.6.2 Funding

- Determination of how the improvement concepts affect the cost and ability of Virginia to borrow to fund transportation and other needs in the future.

This issue is a VDOT budget issue and is outside the scope of the Tier 1 EIS. As part of the toll pilot project process, VDOT would have to develop a financial plan, that would be part of their long range transportation planning process.

Process

There were only a few major or recurring process issues raised during Scoping. These issues involved:

- A request that FHWA provide National Park Service with cooperating agency status for the Tier I EIS, because of potential effects of widening I-81 on the Appalachian Trail.

On January 8, 2004, the FHWA requested the National Park Service to become a cooperating agency.

- Concern about the timing of the Tier 1 and Tier 2 NEPA process in relation to the parallel Public-Private Transportation Act (PPTA) process for I-81 and the need for the Study to objectively and thoroughly consider a full range of actions, alternatives, and impacts to overcome any bias that the PPTA recommendations and decisions may contribute to the NEPA process.

The NEPA process and the PPTA process are independent processes, each with a different purpose. The PPTA is a state law with the purpose of selecting a contractor. The NEPA process is a federal process that will allow informed decisions on solving the problems of the I-81 corridor. The PPTA process will not influence the alternatives analysis required by NEPA or decisions on the improvement concepts.

- Desire for a better public involvement effort (including more advance public notice) because the general public does not understand the decision-making process for the I-81 improvements and the roles played by various factions. There was also a desire for the public involvement process to be open, cooperative, collaborative, and continuing in order to solicit public comments on the Study and an appeal for an opportunity for the public to review and comment on a formally prepared Purpose and Need Statement. Finally, there was a request for the public information meetings to be converted to the hybrid-meeting format to include a question-and-answer session in which citizens comments and questions are publicly heard and answered by VDOT staff.

VDOT will conduct public involvement in accordance with the plan outlined in the I-81 Corridor Improvement Study Public Participation Methods Report. These methods are above and beyond the requirements of the CEQ Regulations, FHWA's Environmental Impact and Related Procedures (23 CFR 771), and VDOT's Policy Manual for Public Participation in Transportation approved by FHWA.

These methods include:

- ***Public Scoping Meetings.*** *Seven public information meetings were held along the corridor where interested citizens were encouraged to attend and learn about the study, provide their ideas about how the I-81 corridor could function in the future, and help identify the issues to be included in the study's Tier 1 EIS.*
- ***Public Hearings****. After the Tier 1 Draft EIS is made available for public review, public hearings will be scheduled in the I-81 study area.*
- ***Newsletters****. Newsletters will provide brief summaries of the study progress and schedule, upcoming meetings, and particular issues or analyses of concern.*
- ***Web Site/E-Mail Link****. Information concerning this study is posted on VDOT's web site at www.virginiadot.org/projects/constSTAN-I81 proj-default.asp.*
- ***Press Releases****. Press releases may include study status updates, NEPA process information, relevant information about the I-81 corridor, and information on public outreach activities.*

The Tier 1 Draft EIS will include a discussion of the study's Purpose and Need. The public will have an opportunity to comment on that discussion when the Tier 1 Draft EIS is made available for review.

A traditional public hearing, in which the public has the opportunity to make verbal comments, may be held if deemed appropriate, or if a written request is received from the governing body of the county, city or town in which the route is proposed to be located or upon the written request of twenty-five citizens. The written request must be received within fourteen days following the first published notice of the hearing.

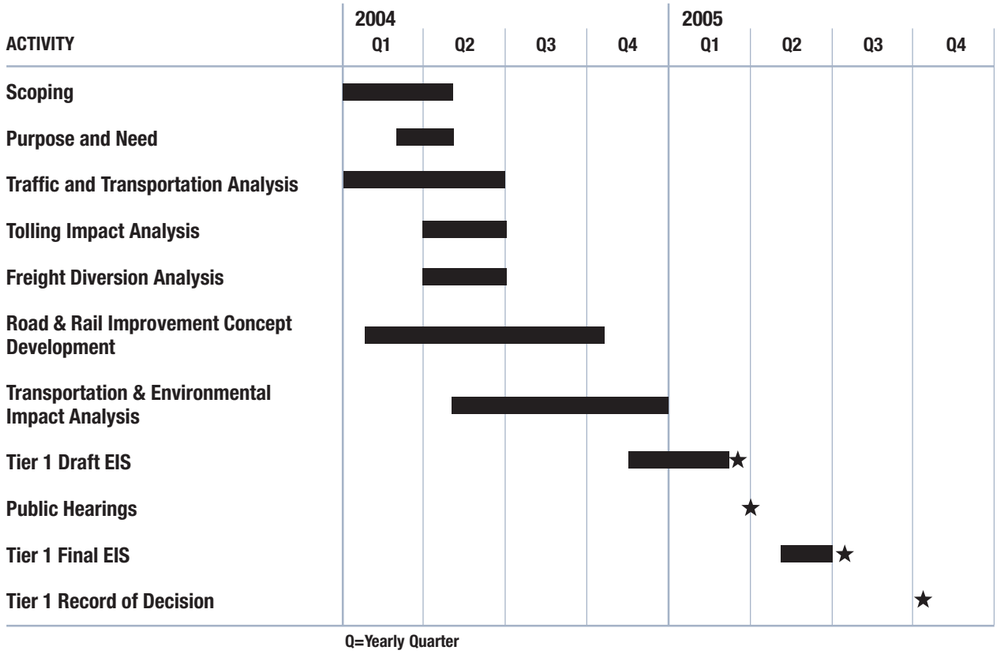
Regardless of the format of the public hearings, all comments will be included in the public hearing transcript for consideration by the CTB and FHWA. In addition, the Tier 1 Final EIS will include responses to substantive comments received on the Tier 1 Draft EIS.

- Concern about designating projects along segments of I-81 with Categorical Exclusion and Environmental Assessment status in the Tier 1 EIS, rather than conducting environmental analyses for all segments of I-81 in Tier 2 EISs.

The Process Streamlining Agreement Between the Virginia Department of Transportation and the Federal Highway Administration on the Interstate 81 Corridor National Environmental Policy Act Process defines the decisions to be made and the approvals to be granted at specific milestones related to the tiered environmental study and defines the study process and elements to be included in each stage of the tiered analysis. One of the Tier 1 decisions listed in this agreement is the type of Tier 2 NEPA documents that would be required. The level of any Tier 2 NEPA document would depend on what the proposed project entails. For example, a truck climbing lane within the existing right-of-way would likely not have a significant impact on the environment.

Appendix A
Scoping Information Package

Study Schedule



Study Schedule

The I-81 Tier 1 NEPA process is scheduled to be completed in approximately mid-2005 and consists of the following tasks and completion dates:

- **Scoping:** Spring 2004
- **Tier 1 Draft EIS:** Winter 2005
- **Public Hearings:** Spring 2005
- **Tier 1 Final EIS:** Summer 2005

Who to contact for additional information

For additional information concerning the project, please contact:

Mr. Christopher Collins
Project Studies Manager
Virginia Department of Transportation
1401 E. Broad Street
Richmond, VA 23219
E-mail: CG.Collins@VirginiaDOT.org
Phone: (804) 225-4249

I-81 Corridor Improvement Study

SCOPING INFORMATION PACKAGE

The I-81 Corridor Improvement Study will identify corridor deficiencies, study the feasibility of tolls, develop potential solutions to address corridor needs, and be in accordance with the provisions of the National Environmental Policy Act for a number of federal actions. The purpose of this Scoping Information Package is to provide information to assist agencies in identifying the issues to be addressed in the Tier 1 EIS.

Study Area

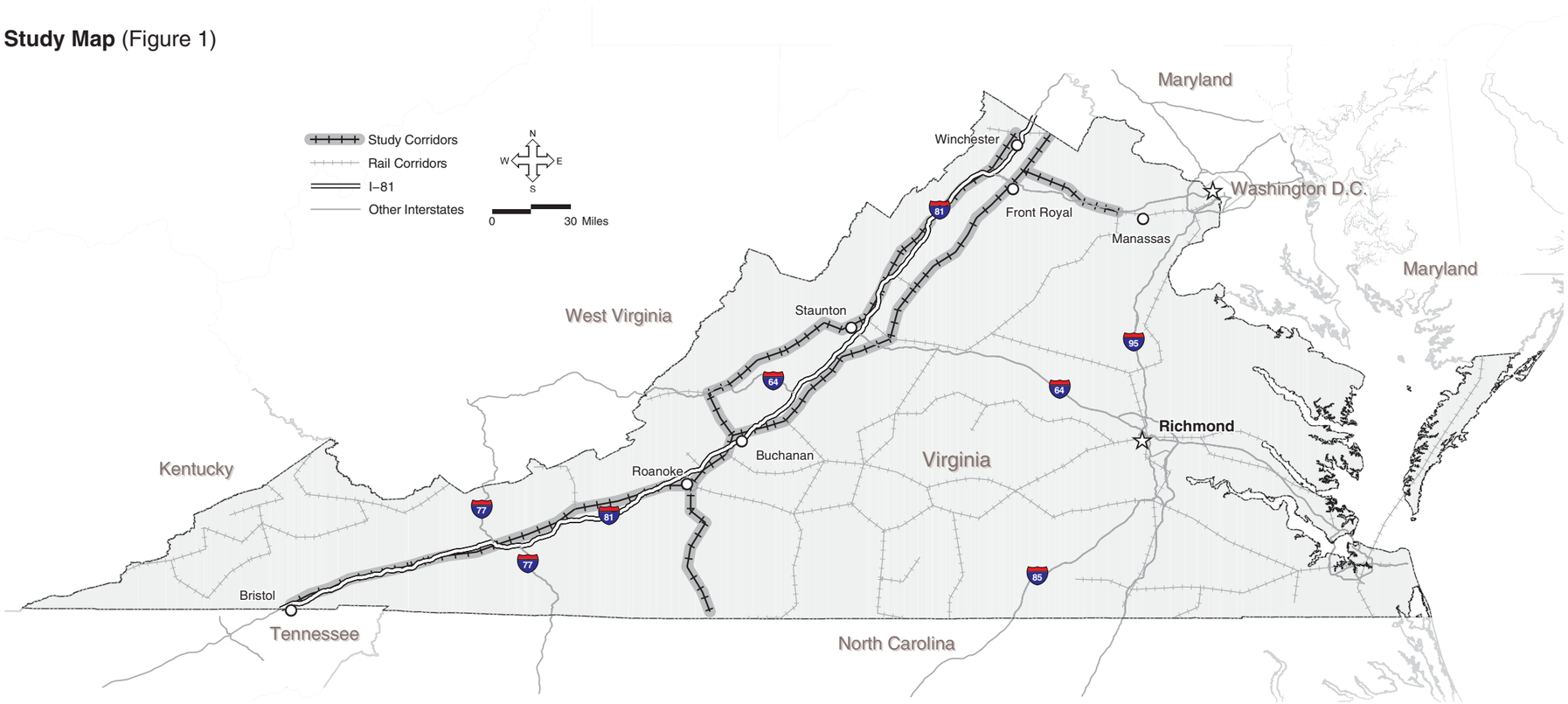
I-81 Corridor. The I-81 Corridor Improvement Study Area includes the entire 325-mile length of I-81 in Virginia from the Tennessee state line in Bristol north to the West Virginia state line. I-81 is the longest interstate in Virginia and has 93 interchanges, including interchanges with I-66, I-64, I-581, I-77 and I-381. The boundaries of the study area generally extend 500 feet on either side of the I-81 edge of pavement, except for the cultural resources study area, which will extend 1,000 feet from either side of the I-81 edge of pavement. The study area includes I-581 from its interchange with I-81 to the Peters Creek Road Interchange. The I-81 Corridor Improvement Study will also explore potential opportunities for sections of roadway on new location. *See Figure 1 on next page.*

Rail corridors. The study will also involve rail corridors that could be improved to help divert truck traffic from I-81. These rail lines include:

- The Norfolk Southern (NS) rail line that is parallel to the I-81 corridor from the Tennessee state line to the West Virginia state line. This line, known as the Shenandoah Route, is generally to the east of I-81 between Roanoke and the West Virginia state line,
- The rail line that is generally parallel to and west of I-81 between Roanoke and West Virginia. Short rail spurs connect this line with the Shenandoah Route at several locations.
- The east-west rail line between Front Royal and Manassas.
- The north-south rail line between Roanoke and the North Carolina state line.

The study area will extend 500 feet from the centerline of these rail rights-of-way, except for the historic properties study area, which will extend 1,000 feet from the centerline of the rail rights-of-way.

Study Map (Figure 1)



NEPA Tiering Process

FHWA and VDOT have elected to use a tiered approach for the EIS so that they can make informed decisions on a number of broad corridor-wide issues. Upon completion of the Tier 1 study, decisions will be made on:

- Potential improvement concepts
- Modal choice
- Operational concepts (for example, separation of automobiles and trucks)
- The feasibility of toll funding
- Projects with independent utility and logical termini
- The levels for Tier 2 NEPA documents
- The location of the corridors for studying future highway and rail alignments in the Tier 2 NEPA documents
- Priority of projects for design and construction.

Subsequent Tier 2 NEPA documents, prepared for the independent projects identified during Tier 1, will then address more site-specific details consistent with a second tier NEPA study.

Scoping

VDOT is planning to hold a series of seven Public Scoping Meetings and seven local Government Scoping Meetings at locations along the I-81 corridor. Information pertaining to the I-81 corridor, the project schedule, and the purpose of the study will be on display. Upon completion of the Scoping process, a Scoping Meeting Summary will be prepared that will document the issues and concerns raised during the Scoping process.

For additional information about the Scoping Meetings, please contact Christopher Collins, VDOT Project Studies Manager at CG.Collins@VirginiaDOT.org (804)225-4249

Environmental Impact Analysis

The Tier 1 EIS will examine the potential environmental impacts of the improvement concepts being studied. The assessment of environmental resources will be generally based on readily available GIS data or mapping, limited field reconnaissance, agency input, and other data sources. The environmental resources to be studied include, but are not necessarily limited to, the following:

- Historic properties and archeological sites;
- Threatened or endangered species or their critical habitat;
- Parks, recreational areas, and open space easements;
- Farmland and agricultural/forestal districts;
- Social and economic considerations;
- Land use;
- Wetlands and water resources;
- Visual resources; and
- Air quality and noise impacts.

Together with input from various agencies and the public, these technical analyses will provide the basis for the results presented in the Tier 1 EIS.

Public Outreach and Agency Coordination

VDOT and FHWA will strive to disseminate timely information about the study to relevant federal, state, and local agencies; other interested parties; and the public as well as to solicit the input of these parties on the study. The means for public outreach and agency coordination are described below:

- **Public Hearings**. After the Tier 1 Draft EIS is made available for public review, public hearings will be scheduled in the I-81 study area.
- **Newsletters**. Newsletters will provide brief summaries of the study progress and schedule, upcoming meetings, and particular issues or analyses of concern.
- **Web Site/E-Mail Link**. Information concerning this study is posted on VDOT's web site at *www.virginiadot.org/projects/constSTAN-I81proj-default.asp*
- **Press Releases**. Press releases may include project status updates, NEPA process information, relevant information about the I-81 corridor, and information on public outreach activities.

FHWA and VDOT will coordinate with federal, state, regional, and local agencies through partnering meetings and coordination meetings in which they provide agencies with updated study information and seek agency input on various study-related issues.

Appendix B
I-81 Corridor Improvement Study Newsletter

I-81 UPDATE

Virginia Department of Transportation *February 2004*

INTRODUCTION

Welcome to *I-81 Update*, a newsletter published periodically by the Virginia Department of Transportation on issues associated with Interstate 81 in Virginia. This edition introduces you to the new I-81 Corridor Improvement Study.

Completed more than 30 years ago, I-81 currently carries more and heavier vehicles than it was originally designed to handle.

The Corridor Improvement Study will consider future improvements to I-81 from the Virginia/West Virginia state line to the Virginia/Tennessee state line – a distance of 325 miles. The Corridor Improvement Study is just beginning and is currently in the phase called *Scoping*. The I-81 Corridor Improvement Study will lead to the completion of a Tier 1 Environmental Impact Statement (EIS), in accordance with the National Environmental Policy Act (NEPA). FHWA and VDOT have agreed to comply with NEPA by conducting the study in a two-part, or tiered, process.

When the Tier 1 study is completed, these decisions will be made:

- Improvement concepts for highway and rail facilities, such as the number of additional highway lanes that may be needed; partial or complete separation of trucks and passenger vehicles; and additional rail capacity
- Approval to advance I-81 as a toll pilot project under current federal law
- Roadway and rail components to be studied in Tier 2

Your input during the study process is important as we identify transportation needs, begin developing a broad range of solutions to meet those needs, and evaluate the impacts of the potential solutions.

PUBLIC MEETINGS SET FOR I–81 CORRIDOR IMPROVEMENT STUDY

Seven public information meetings are scheduled along the 325-mile Interstate 81 corridor in February 2004, and interested citizens are encouraged to attend to learn about the new I-81 Corridor Improvement Study and to provide their ideas about how the I-81 corridor could function in the future.

The meetings, called Public Scoping Meetings, are a part of the I-81 Corridor Improvement Study sponsored by the Federal Highway Administration (FHWA) and the Virginia Department of Transportation (VDOT). The study will identify deficiencies along the interstate as well as opportunities for improvements throughout the corridor in Virginia.

The meetings are part of the public involvement component of the corridor improvement study, which is being conducted under the auspices of the National Environmental Policy Act (NEPA). Other meetings and opportunities for feedback will be offered to citizens throughout the study.

During the scoping meetings, citizens can view displays and maps pertaining to the corridor. The purpose of the I-81 Corridor Improvement Study, as well

(Continued on Page 2)

Public Scoping Meetings are scheduled from 4–8 p.m. at the locations shown below:

February 10		February 12	
Abingdon	**Wytheville**	**Lexington**	**Harrisonburg**
Southwest Virginia Higher Education Center Grand Hall One Partnership Circle Abingdon, VA 24212	Ramada Inn of Wytheville 955 Pepper's Ferry Road Wytheville, VA 24382	Hampton Inn 401 E. Nelson Street Lexington, VA 24450	Four Points by Sheraton 1400 E. Market Street Harrisonburg, VA 22801
February 11		**February 17**	
Christiansburg	**Salem**	**Winchester**	
Montgomery County Government Center 1st Floor Multipurpose Room 755 Roanoke Street Christiansburg, VA 24073	Salem Civic Center Community Room 1001 Boulevard Salem, VA 24153	Travelodge of Winchester 160 Front Royal Pike Winchester, VA 22602	

Additional information on upcoming public meetings, public hearings and workshops will be posted regularly at: **www.VirginiaDOT.org**

PURPOSE OF THE STUDY

The I-81 Corridor Improvement Study will identify deficiencies throughout the corridor, develop a range of potential solutions, and evaluate those solutions. Broad issues – not site-specific situations – will be addressed in this study. A Tier 1 Environmental Impact Statement will be produced, which will identify areas for further study in subsequent Tier 2 study and documentation.

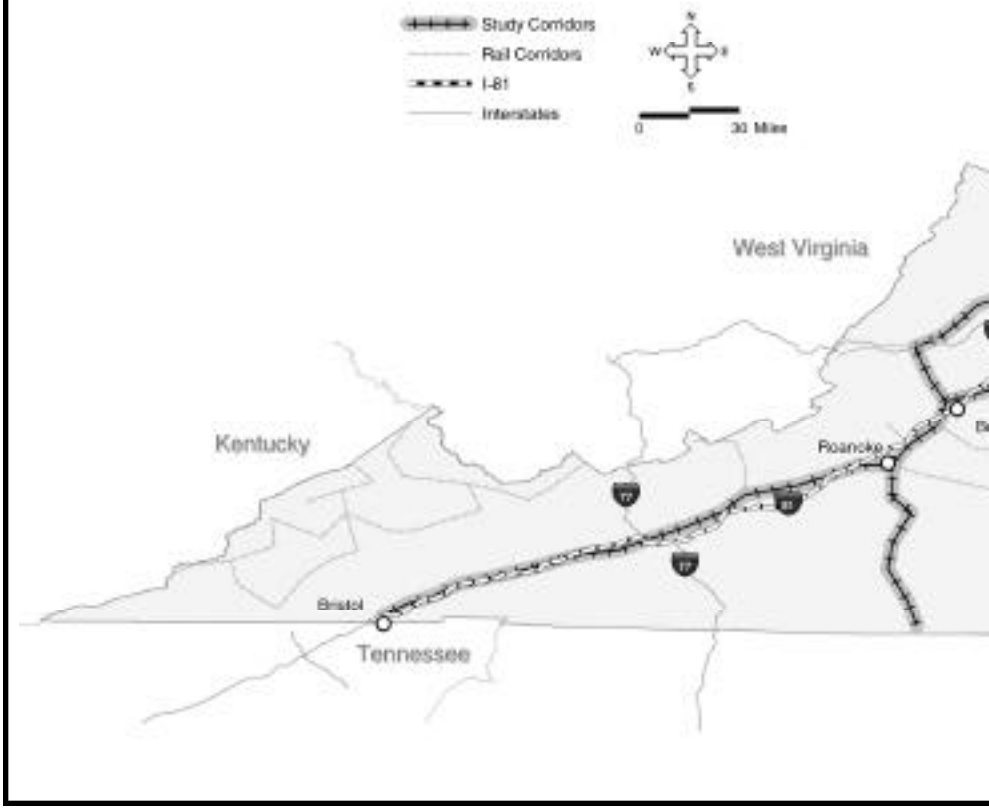
(Continued from Page 1)

as the study's schedule, will be displayed. Citizens also can speak one-on-one with study team members to get information about the study. Meeting participants will have the opportunity to leave comments in written form, or speak with a court reporter, who will record their comments and suggestions.

Scoping meetings are important in fulfilling NEPA requirements because they provide citizens with an early opportunity to help identify the need for improvements within the corridor, as well as identify the issues to be included in the study's Environmental Impact Statement.

In addition to public meetings, a Web site is available that includes continuously monitored e-mail accounts at www.VirginiaDOT.org.

STUDY MAP



I-81 CORRIDOR IMPROVEMENT STUDY Q & A

Will the Study Consider the Options for Improving I-81 Proposed by Two Companies through the PPTA?

VDOT and FHWA will rigorously explore and objectively evaluate all reasonable alternatives. We anticipate that the improvement concepts evaluated could include, among others, the options proposed through Virginia's PPTA process.

How will Rail Options be Considered in the Study?

Detailed traffic and transportation studies will be conducted to identify transportation deficiencies associated with the I-81 corridor. Potential solutions that address these deficiencies, including rail and a combination of rail and highway, will be evaluated to determine their ability to address those deficiencies.

What is Tiering?

The tiering or phasing of Environmental Impact Statements (EIS) allows broad discretion on issues to be addressed in first and second tier environmental documents. This flexible approach was agreed to by the Federal Highway Administration and the Virginia Department of Transportation for the I-81 Corridor Improvement Study. This study will consist of a Tier 1 EIS, a Record of Decision (ROD) from FHWA to conclude Tier 1, and the defining of issues to be addressed in further Tier 2 environmental study.

When Will the Public Have an Opportunity to Participate in the Study?

There will be numerous opportunities for public participation in the study, including public meetings, a Web site, **www.VirginiaDOT.org**, and a continuously monitored e-mail account through which anyone can provide comments.

I-81

Environmental Division
Virginia Department of Transportation
1401 E. Broad Street
Richmond, VA 23219

Inside

STUDY SCHEDULE

This portion of the I-81 Corridor Improvement Study is scheduled to conclude in about 18 months. Here is a list of scheduled study tasks and completion times:

Scoping **Spring 2004**
Determines the scope of issues to be addressed and identifies the significant issues related to the I-81 corridor.

Traffic and Transportation Analysis **Summer 2004**
The year 2035 traffic conditions will be projected and analyzed in order to identify corridor deficiencies and operating characteristics of concepts.

Concept Development/Refinement **Fall 2004**
Develops the options to address corridor deficiencies.

Environmental Impact Analysis **Winter 2004/2005**
Evaluates the impacts of transportation improvement concepts at a general level. Site specific analyses will occur in Tier 2.

Tier 1 Draft EIS **Winter 2005**
Documents the traffic, engineering and environmental information.

Public Hearings **Spring 2005**
Provides opportunity for the public to comment on the Tier 1 Draft EIS.

Tier 1 Final EIS **Summer 2005**
Documents Commonwealth Transportation Board (CTB) action and addresses the comments on the Tier 1 Draft EIS and from the Public Hearing.

Following completion of the Tier 1 EIS, a Record of Decision (ROD) will be issued by the Federal Highway Administration. Detailed Tier 2 studies are expected to advance in phases.

For additional information regarding the study, please contact:

- Mr. Christopher Collins
  Project Studies Manager

  Virginia Department of Transportation
  1401 E. Broad Street
  Richmond, VA 23219

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Appendix C
Scoping Meeting Boards and Presentation Slides

I-81 CORRIDOR IMPROVEMENT STUDY

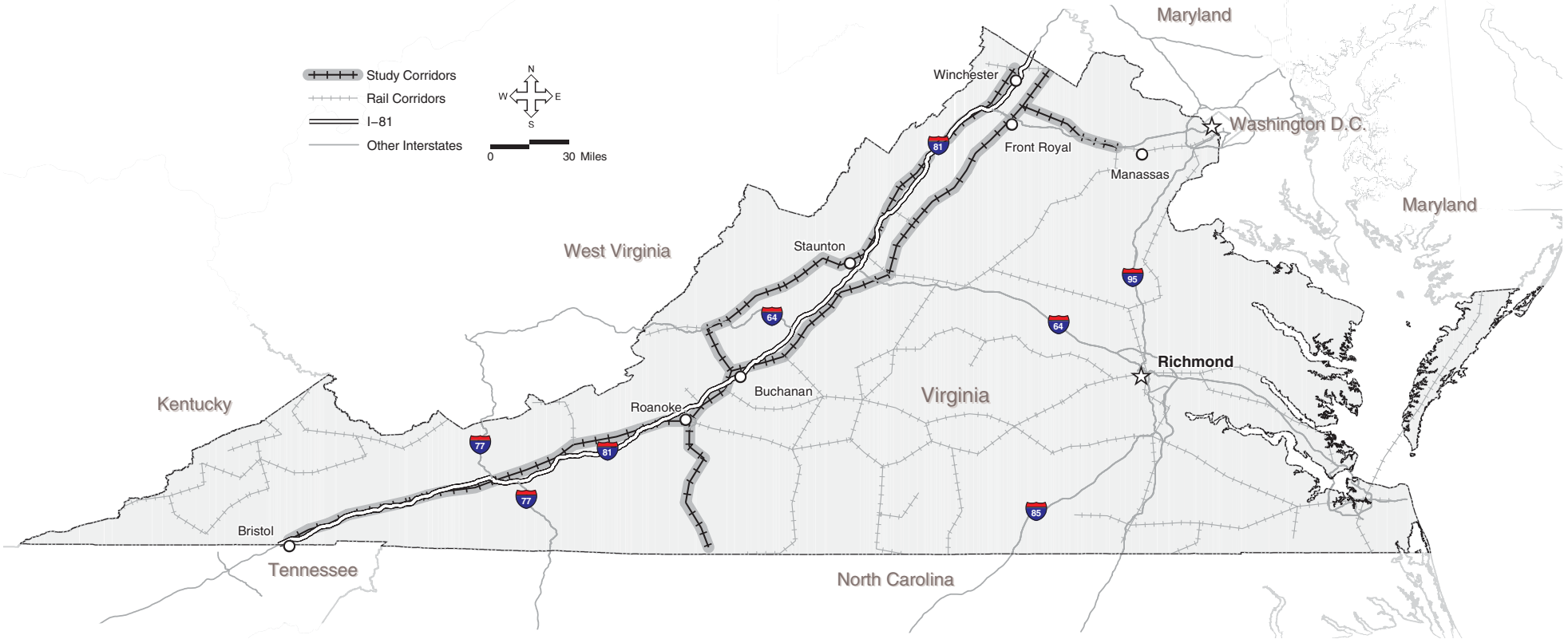
Scoping Meeting

February 2004

VDOT We Keep Virginia Moving

I-81 CORRIDOR IMPROVEMENT STUDY

Study Map



VDOT We Keep Virginia Moving

I-81 CORRIDOR IMPROVEMENT STUDY

What is the purpose of this study?

- Identify corridor deficiencies
- Develop potential solutions to address corridor needs
- Evaluate impacts of potential solutions
- Explore possibilities of diverting freight to rail
- Explore the feasibility of tolls
- Provide information to the Commonwealth Transportation Board and Federal Highway Administration to make informed decisions
- Comply with the National Environmental Policy Act (NEPA)

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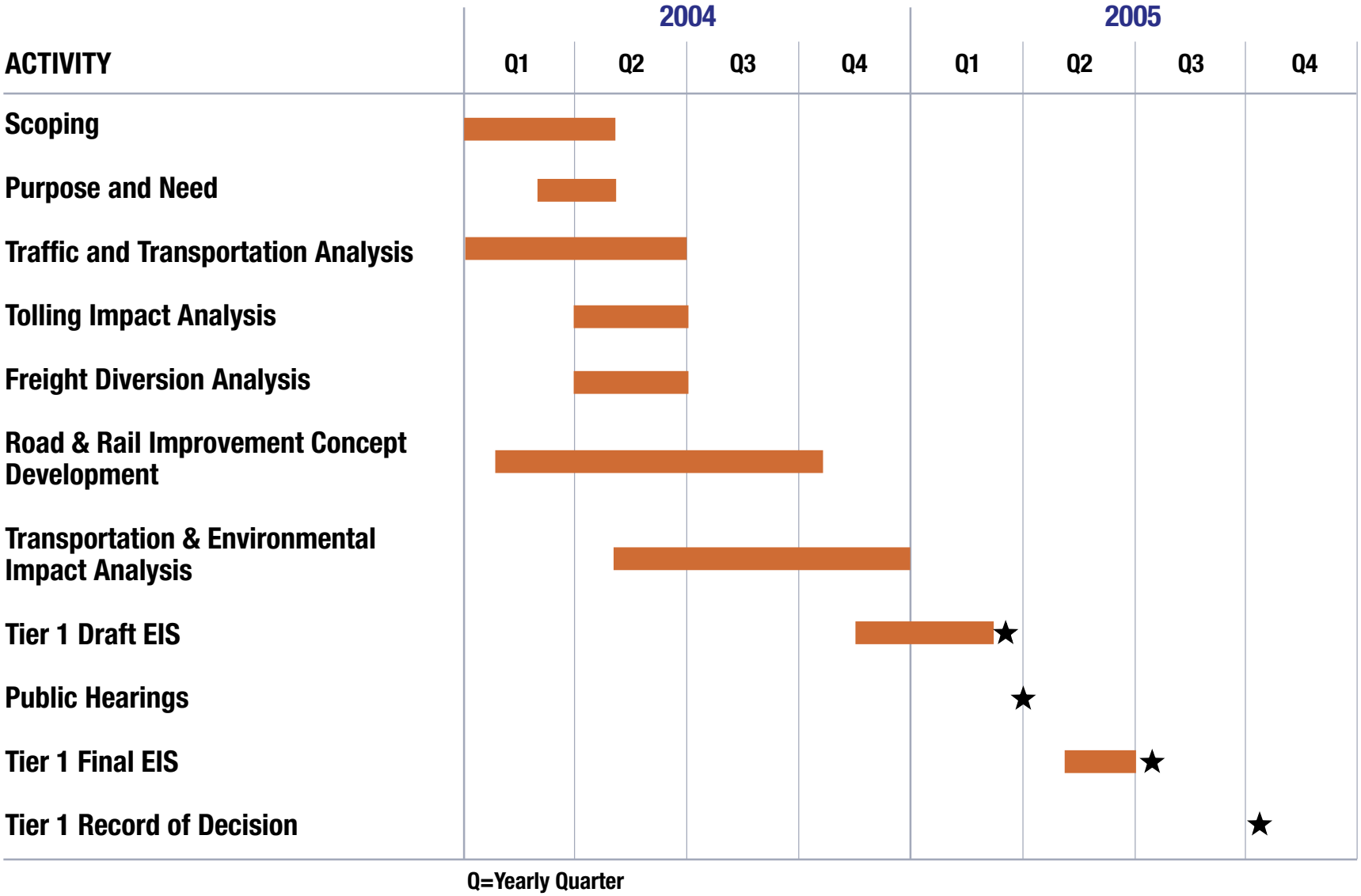
Relationship Between Public/Private Transportation Act (PPTA) and the I-81 Corridor Improvement Study

- Two PPTA proposals for improving I-81 (STAR and Fluor).
- NEPA clearance required before PPTA proposals can be implemented.
- I-81 Corridor Improvement Study, which includes NEPA, conducted independently of PPTA proposals.

I-81 CORRIDOR IMPROVEMENT STUDY

Study Schedule



Q=Yearly Quarter

VDOT We Keep Virginia Moving

Tiered NEPA Process: Relationship between Tier 1 and Tier 2

Tier 1

- Corridor-wide purpose and need
- Development of general solutions
- Impacts based on readily available information

Tier 2

- Approval of conceptual design features identified in Tier 1
- Authority to use federal funds on final design
- Authority to acquire Right-of-Way
- Eligibility for federal funding for construction
- Approval to modify access to I-81

Problem Identification

- Considers transportation needs along the corridor now and in the future
- Fact-based analysis
- Serves as basis for developing solutions
- Serves as basis for determining effectiveness of solutions
- Considers capacity, safety, economic development and other corridor conditions

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Potential Solutions

- The study will consider improvement concepts for highway and rail such as:
  - *Additional highway lanes*
  - *Segregation of trucks and passenger vehicles on I-81*
  - *Additional rail capacity*
- Concept development will be based on needs
- Concepts will be developed to the level of detail that:
  1) *Is necessary to assess corridor-wide impacts, and that*
  2) *Assists in the determination of concept effectiveness*
- Estimated costs will also be considered

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Impact Analysis

- Based on coordination with local government, state and federal agencies and the public
- Based on agency data, Geographic Information Systems and limited field reviews
- Appropriate to support decisions

Issues to be Studied

- Historic Properties
- Threatened and Endangered Species
- Parks/Recreational Areas
- Agricultural/Forestal Districts
- Social and Economic Considerations
- Aquatic Resources
- Farmland
- Land Use
- Visual Resources
- Air Quality
- Noise

I-81 CORRIDOR IMPROVEMENT STUDY

Public Outreach

- Public Scoping Meetings
- Public Hearings
- Newsletters
- Web Site/E-mail (www.virginiadot.org/projects/constSTAN-I81proj-default)
- Press releases

Contact Information

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Phone: (804) 225-4249

VDOT We Keep Virginia Moving

Interstate 81 Corridor Improvement Study

Scoping Meetings

February 2004

Background

- I-81 studied for many years
  - On-going Projects
  - Two PPTA proposals in 2003
- NEPA clearance required before certain federal actions can occur
- Study conducted independently of PPTA proposals

Purpose of Scoping Meeting

- To share the study approach
- To identify issues to be addressed in the Tier 1 EIS
- To request information from agencies, officials, and the public

Purpose of Study

- Identify corridor deficiencies
- Develop potential solutions to address corridor needs
- Evaluate impacts of potential solutions

Study Management / Roles

- FHWA – Lead federal agency for Tier 1 EIS
- Commonwealth Transportation Board
- VDOT Study Team:
  - VDOT Project Manager (Chris Collins)
  - VDOT and DRPT Staff
  - Consultant Team

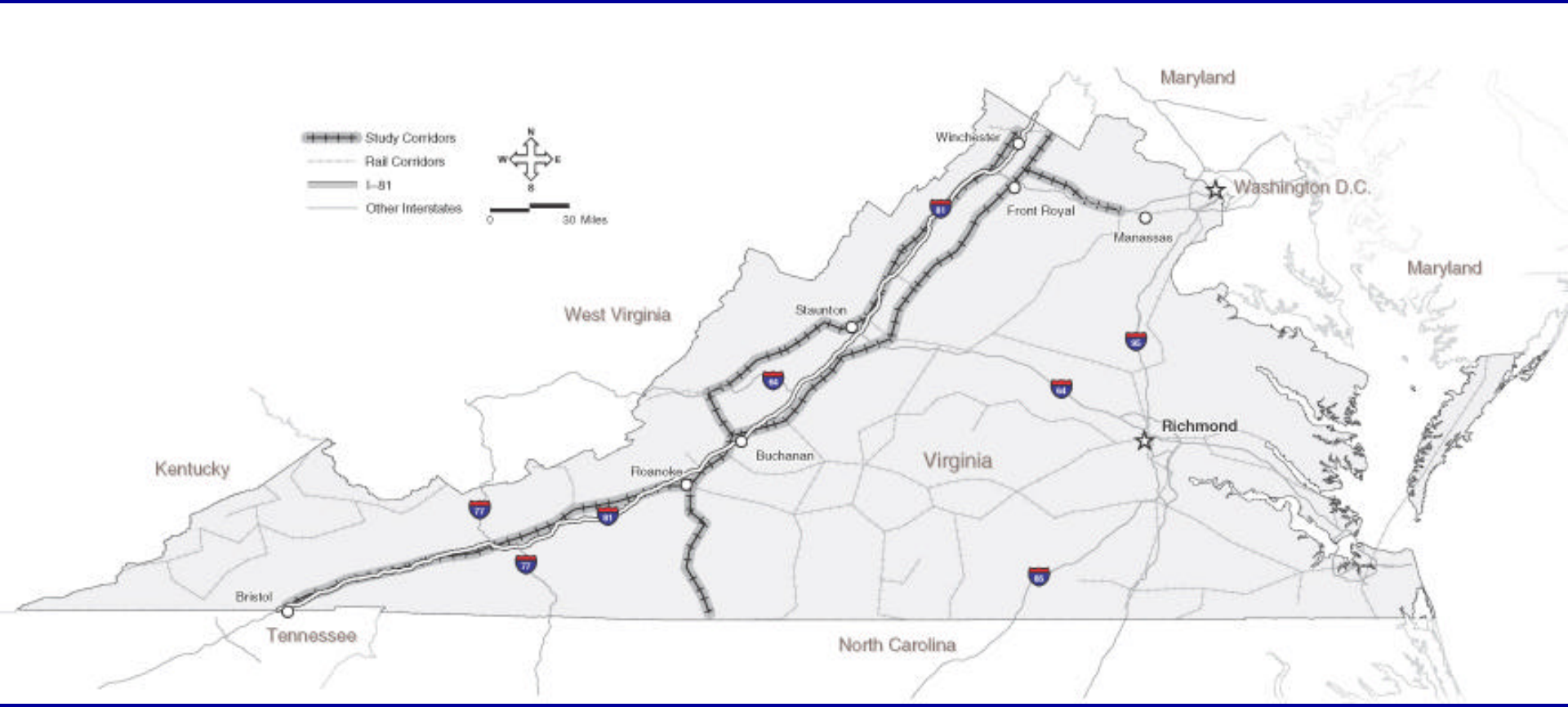
I-81 Study Area

- I-81 Corridor
  - TN/VA Stateline to VA/WV Stateline
  - 325 miles, 93 interchanges

I-81 Study Area
(Continued)

- Rail corridors to be studied:
  - Norfolk Southern– Shenandoah Route, Tennessee to West Virginia
  - CSX/NS – West of I-81,Roanoke to WV
  - Norfolk Southern – Front Royal to Manassas
  - Norfolk Southern – Roanoke to NC

Study Map


Study Corridors
Rail Corridors
I-81
Other Interstates
30 Miles
Maryland
Winchester
Front Royal
Washington D.C.
Manassas
Maryland
West Virginia
Staunton
Richmond
Buchanan
Roanoke
Virginia
Kentucky
Bristol
Tennessee
North Carolina

NEPA Tiering

- Address corridor-wide issues in Tier 1
- Address site-specific issues in Tier 2
- Study will result in a Tier 1 Draft & Final EIS and Record of Decision

I-81 Tier 1 EIS Decisions

- Potential improvement concepts
  - Modal choice
  - Operational concepts (for example, separation of cars and trucks)

- Feasibility of toll funding

I-81 Tier 1 EIS Decisions
(Continued)

- Stand alone site specific sections to be evaluated in Tier 2 and type of Tier 2 document
- Location of corridors to be studied in Tier 2 documents
- Priority of projects for design and construction

Environmental Impact Analysis

Analysis based upon:

- Public Input
- Agency Input
- GIS information
- Limited field reviews

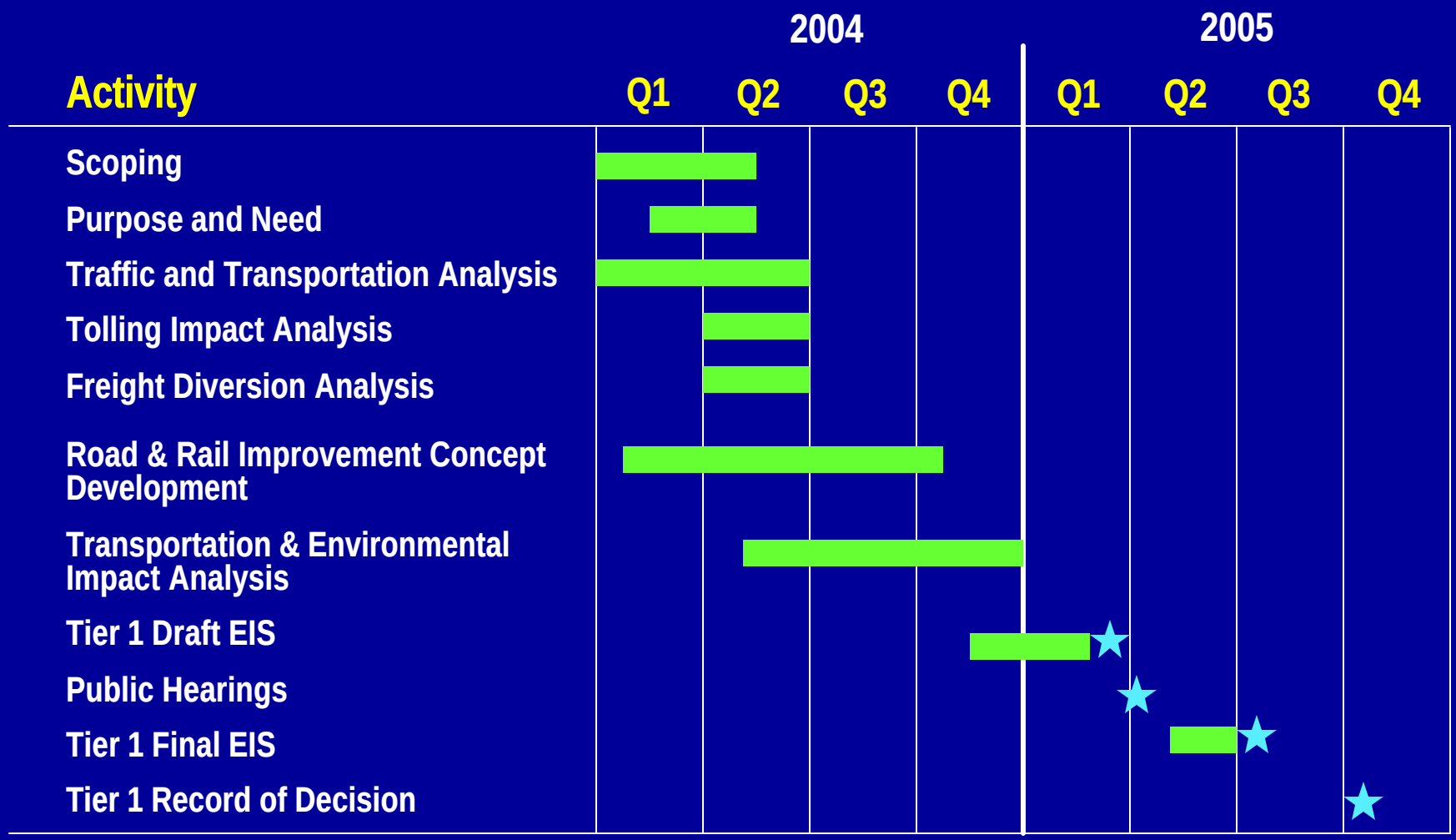
Resources to be Studied

- Historic Properties
- Threatened and Endangered Species
- Parks/Recreational Areas
- Farmland
- Agricultural/Forestal Districts
- Social and Economic Considerations

Resources to be Studied
(Continued)

- Land Use
- Wetlands and Water Resources
- Visual Resources
- Air Quality
- Noise Impacts

Study Schedule



Q=Yearly Quarterly

Public Outreach

- Public Scoping Meetings
- Public Hearings
- Newsletters
- Website/E-mail (www.virginiadot.org/projects/constSTAN-I81proj-default)
- Press Releases

Scoping Meeting Summary

- Discussion of information presented
- Summary of major issues/concerns
- Description of what will be included in Tier 1 EIS
- List of formal written and verbal comments

Submit Comments to

Mr. Christopher Collins
VDOT Project Studies Manager

www.VirginiaDot.org

Appendix D
Agency Scoping Meeting Minutes

I-81 CORRIDOR IMPROVEMENT STUDY

Meeting Notes

Purpose:	I-81 Corridor Improvement Study Agency Scoping Meeting
Date/Time:	February 3, 2004/1:30 PM
Place:	VDOT
Regarding:	
Notes taken by:	Frank Bracaglia **Prepared on:**
Attendees:	See Sign-In Sheets

Chris Collins (VDOT) distributed the Scoping Information Package. He indicated that the purpose of this meeting was to explain the approach that VDOT will take with the study and to provide an opportunity for feedback.

Chris Collins introduced the Study Team and began his introduction with some background.

There are two processes occurring simultaneously, the NEPA process and the PPTA process. There are two PPTA proposals from private groups on ways to construct improvements along I-81. The corridor improvements in the PPTA proposals each have a different purpose and a different outcome. The purpose of the PPTA process is to select a contractor. The purpose of the NEPA process is to determine the solution for the I-81 corridor.

VDOT has applied to FHWA to place tolls on I-81. There will be no final toll approval as part of this study, since the toll application requires more information than the study will provide. FHWA has, however, issued a lower level approval—a conditional provisional approval—of I-81 as a toll pilot project.

The Corridor Improvement Study will define the problems, develop potential solutions (*i.e.*, address a yet-to-be-defined need), and identify the impacts of potential solutions. There will be no influence from the PPTA process, however, the PPTA proposals may be considered, although we do not know to what extent.

The purpose of the study is to comply with NEPA and provide facts for CTB decisions. The end result is that CTB selects the improvement concept and FHWA issues the Record of Decision.

The reason why we are using a tiered approach is because there are corridorwide issues, such as tolling and mode choice, that must be decided and because the corridor is 325 miles long. The NEPA process will be the vehicle for a fact-based analysis to address these corridorwide issues. Site-specific issues will be visited in Tier 2.

A copy of the FHWA/VDOT Process Agreement was distributed. The purpose of the agreement is to define the process for tiering. It defines the approach, which uses the traditional tiered approach consisting of a Tier 1 Draft EIS, Tier 1 Final EIS, and a Tier 1 ROD, followed by Tier 2. The agreement also outlines the kinds of decisions that are to be made and includes a conflict resolution process.

The Tier 1 decisions that are to be made are:

- Improvement Concepts
- Tolls
- Mode Choice
- New Location (I-81/I-77)
- Are there sections of roadway that have logical termini and independent utility?

Tier 2 Decisions are also listed in the agreement.

The Tier 1 EIS will rely on existing information. The EIS will not have the level of detail that reviewers are used to seeing in Tier 2 EISs.

VHB and a large team is under contract to perform the study.

The time frame for the study is 18 months. In that period, we can do what we need to do to make the decisions that need to be made. Public Scoping Meetings begin next Tuesday (February 10, 2004).

VDOT will be asking for quick reviews from agencies, but the study will probably require less overall time for the agencies to review because it will have less detail.

Chris Collins then turned the meeting over to Craig Eddy (VHB). Craig indicated he was going to discuss each of the activities listed in the study schedule (see Scoping Information Package), specifically why they were being performed and their time frames.

There will be Scoping Meetings for the agencies, local governments and the public. The purpose of these meetings is the same as mentioned at the beginning of the meeting. Technically, Scoping will continue through the entire length of the process.

The Purpose and Need is a subset of the Transportation Analysis. The horizon year that the Study Team will use for the Transportation Analysis is 2035, which is beyond the horizon year for local comprehensive plans. Traffic projections are extremely important and we have to build an airtight methodology to develop them. Our methodology involves existing data, 2020 projects, land use, and the statewide model.

The Tolling Impact Analysis has to identify sensitivity of the trucking industry and of the public to tolls and identify diversion of traffic to routes parallel to I-81. The Study Team has a subconsultant that developed a methodology to perform this work.

DRPT has published the latest study on the potential for freight diversion. The Study Team must verify this information and how it is affected by tolls. Freight on rail moves differently than freight on trucks since rail freight is longer haul.

After the Study Team prepares the Purpose and Need, it will then develop rail improvement concepts, roadway improvement concepts, and hybrid (rail and roadway) improvement concepts. The Study Team will conduct a broad-brush analysis that will use criteria, such as cost, environmental impacts, and ability to serve the transportation need, to screen the improvement concepts.

The Transportation and Environmental Impact Analysis will discuss operational and environmental impacts.

The Tier 1 Draft EIS is scheduled to be completed in 14 months, followed by Public Hearings and the Tier 1 Final EIS.

The Scoping Comment Period deadline is February 20, 2004. The Study Team will prepare Post-Scoping documentation.

A question and answer session followed.

Q: Will fatal flaws be determined in the environmental analysis?

A: Yes, to the extent that is possible with a GIS-level analysis. The level of information that will be generated for this Tier 1 EIS will be less than in a traditional (Tier 2) EIS.

Q: Is there a schedule for the public meetings?

A: There is already a schedule for the Public Scoping Meetings on the VDOT Web Site (www.VirginiaDOT.org). It will be on the Study Web Site by Friday, February 6, 2004. There will be Public Scoping Meetings on February 10, 2004 in Abingdon and Wytheville, on February 11, 2004 in Christiansburg and Salem, on February 12, 2004 in Lexington and Harrisonburg, and on February 17, 2004 in Winchester. There will also be a series of public hearings after the analyses are completed.

Q: Will VDOT study the Piedmont Route?

A: There will be a separate meeting on that issue.

Q: Are there any Cooperating Agencies?

A: Yes, EPA, U.S. Fish and Wildlife Service, Army Corps of Engineers, TVA, and Coast Guard.

Q: Will the Cooperating Agencies review the Purpose and Need?

A: A review of the Purpose and Need will be conducted through the Partnering Process (with the Army Corps of Engineers). Chris Collins reiterated that VDOT does not know what the problems are yet.

Q: Is there any legislation that will affect this study?

A: There is pending legislation in the Virginia General Assembly but it is mostly related to the PPTA process. There is no federal legislation.

Q: Is the statewide model ready to be used?

A: No, because it does not address freight.

Q: What is VDOT expecting in terms of Scoping comments?

A: In addition to agencies providing data for use in the study, VDOT would like to determine if there are any other issues of which it should be aware. Examples are information that would affect location choice and mode choice, and fatal flaws. However, agencies should use judgement on the level of information that they think is appropriate, given what VDOT is trying to accomplish.

Q: What will be done in terms of historic properties given that there is no Section 106 process being performed in Tier 1?

A: VDOT already has information on the presence of historic sites along the corridor and will use that information to help make recommendations on the decisions that need to be made.

Q: Are there railroads spurs (on the Study Area Map) that should be addressed?

A: Yes, but it is not known yet whether there are going to be any areas of rail on new location. The agencies may have to be reapproached.

Appendix E
List of Scoping Commentors

The following tables provide the names and affiliations of those who provided comments during the Scoping process.

Table 2.1 Federal and State Government Agency Commentors

First Name	Last Name	Agency
Pamela	Underhill	National Park Service
Karen	Mayne	U.S. Department of the Interior, Fish and Wildlife Service
Peter	Stokely	U.S. Environmental Protection Agency
Nicholas	Konchuba	U.S. Army Corps of Engineers
Tom	Ballou	Virginia Department of Environmental Quality
George	Conner	Virginia Department of Rail and Public Transportation
Ellen	Gillinsky	Virginia Department of Environmental Quality
John	Daniel, Jr.	Virginia Department of Environmental Quality
Marc	Holma	Virginia Department of Historic Resources
S. Rene	Hypes	Virginia Department of Conservation and Recreation

Table 2.2 Local Government Commentors

First Name	Last Name	Affiliation
Trenton	Crewe	Town of Wytheville
Edwin	Daley	Town of Winchester
Judy	Kiser	Montgomery County Board of Supervisors
(Board of Supervisors' Resolutions)		Rockbridge County Board of Supervisors
C.M.	Vernon	Town of Abingdon

Table 2.3 Regional Agency Commentors

First Name	Last Name	Affiliation
J.D.	Brugh	Blacksburg/Christiansburg/Montgomery Area Metropolitan Planning Organization
(Agency- Wide Resolution)		Mount Rodgers Planning District Commission
(Agency- Wide Resolution)		Northern Shenandoah Valley Regional Commission
Thomas	Taylor	Mount Rodgers Planning District Commission
Melanie	Stepp-Coughlin	Winchester-Frederick County Convention and Visitors Bureau
(Agency- Wide Resolution)		Win-Fred Metropolitan Planning Organization

Table 2.4 Interest Group Commentors

First Name	Last Name	Affiliation
Sherman	Bamford	Virginia Forest Watch
Warren	Dillenbeck	Rail Solutions
John	Eckman	Valley Conservation Council
Tiffany	Hamby	Shenandoah Valley Network
Fred	Andreae	Scenic 340 Project
Kim	Sandum	Community Alliance for Preservation
Cliff	Cempe	Save our County Committee
Howard	Kittell	Shenandoah Valley Battlefields Foundation
Steve	Krichbau	Wild Virginia
Matthew	Logan	Potomac Conservancy
Richard	Reitsman	Rockbridge Area Conservation Council
Ann	Rodgers	Virginians for Appropriate Roads
Stewart	Schwartz	Coalition for Smarter Growth
Rees	Shearer	Rail Solutions
Dan	Stickley	Shenandoah Battlefields Foundation
Barbara	Walsh	Rockbridge Area Conservation Council
Dan	Walz	Habitat for Humanity
Margaret	Whittington	Rockbridge Citizens Advisory Panel

Table 2.5 Industry Commentors

First Name	Last Name	Affiliation
Bob	Carpenter	Celanese Governmental Affairs
Jerry	Deacon	W.R. Deacon & Sons Timber, Inc.
Steve	Eisenach	Norfolk Southern Railroad

Table 2.6 Private Citizen Commentors

First Name	Last Name	First Name	Last Name
Ben	Addison	Ricky	Cox
Phoebe W.	Allen	Cheryl	Crowell
Gregg	Amonette	Joseph & Sylvia	Crum
Nancy	Anderson	Michael	Davis
Cheryl	Anderson	Carol	Davit
Christine	Andrew	David	Daystar
Jay	Banks	Paul	Dellinger
Chuck	Barten	Bhula	Diam
Arthur	Bartenstein	Trudi	Dixon
Katrina	Bateman	Richard and Linda	Downer
Lemuel & Denise	Battle	Claudia	Duffy
Michael W.	Beahm	David	Duncan
Robert	Beisley	Robin	Eddy
Jerryann	Bier	Joseph	Egyed
Gem	Bingol	Billie M.	Elliot
Louis V.	Blanchet	Matt	Estes
Paul & Nancy	Blaney	Joanie	Evans
Adrienne	Bodie	Marynell	Eyles
Toby	Boian	Walter	Eyles
Greg	Bokan	Roy L.	Fauber
Shelby	Bourdon	Lindy	Felix
Lester A.	Bower	Joseph	Ferrell
Carol	Brackett	Lisa	Field
Jean	Brown	Peter	Fields
William & Joy	Brooks	Charles	Flowers
E.W.	Browning	Peter & Donna	Ford
David	Buck	David L.	Foster
Ed	Butler	James	Frank
Jeremy F.	Camp	Bill	Gable
Susan	Cannedy	John A.	Garnett
Dale & Gloria	Carter	Robert E.	Gibbs
Steve	Chapin	James	Giraytys
Dr. Diana	Christopulos	Wayne	Godlove
Steve	Claytor	J.V.	Gorman, Jr.
J. David	Cochran	James	Graham
Randolph	Cole	Charles	Hagan
Ron	Comer	Judy	Hagen
Carroll	Comstock	Adrienne	Hall-Bodie
R.E.	Conner	R.C.	Halseth
F. Joseph	Copenhaver, Jr.	Teresa	Hanlon
Larry M.	Costigan	Orden L.	Harman
Susan & Brian	Courneya	Mary	Harshfield

First Name	Last Name	First Name	Last Name
Ralph W.	Hart	Jim	Minick
Victoria	Headley	Robert A.	Moyer
Dianne	Herrick	Cynthia	Munley
Adrianne	Hess	Butch	Munson
Michael	Higgins	Sarah	Myers
Ed	Hokanson	Laura	Neale
Kathy	Holm	Robin	Newberry
Robert	Hopkins	Gary	Oates
G.	Hopkins	R.J.	Oliver
Gladys	Hopkins	Jim	Overholser
Robert H.	Hunt	John H.	Page
Bob	Hunt	John	Parcells
Larry	Hurd	James D.	Parlier
Janet	Jarrard	George	Pate
Kathy R.	Jones	Nuk	Patel
W.A.	Jones	Diam	Patel
J.L.	Jones, Jr.	Natu	Patel
John and Rebecca	Kelley	Paul	Patel
J.T.	Kelley, Jr.	MW	Paxton
Kevin	Kennedy	Bob	Peckman
Pam	Kennedy	Kristin	Peckman
Stephen	Kerr	William	Painter
Janet	Kilby	Torben	Pederson
Duke	Kjolhede	Collin	Peel
Karen	Lanning	Jim	Phemister
Sam	Lawson	Mary Ann	Posey
Mike	Leahy	Robert	Pownall
Roger	Lewis	Mrs.	Prillaman
Charles	Lockhart	Rudy	Probst
Deborah S.	Looney	Jack	Rader
Hugh T.	Lucas	Carol	Rendleman
Michael A.	Lynn	Robert N.	Richert
Devan	Malore	Larry & Ann	Richman
Jim	Marchman	Fred	Rickett
Bruce	MacDonald	Pamela M.	Rickett
Steven	Martin	H.	Riegel
Dwayne	Martin	Abe	Rittenhouse
Janice	May	Sandra	Rose
P. Claire	McBrien	Kim	Sandum
Marshall	McMillian-Zaft	Alice	Schaaf
Katrina	McMillian-Zaft	Harry & Amy	Scheuer
Steve	Miller	Mark	Schonbeck
Paul	Miller	C. Marbury	Seaman

First Name	Last Name	First Name	Last Name
James	Settle	William	Whitehead
Steve & Nancy	Shatzer	David A	Whitmore
Kathy	Shearer	Thomas	Wilhelm
Rees	Shearer	Gerald A.	Williams
Eric	Sheffield	Rick	Williams
Charlotte	Shnaider	Jeff	Willis
Elizabeth	Shuman	Jim	Wilson
Bernard	Shwartzman	Patty	Woods
Link	Sides	Elinor	Wright
Jim	Simons	Christina	Wulf
Georgia Murphy	Smallman	Coleen Kristy	Zahnke
William	Smith		
Alexia	Smith		
Greg	Speck		
B.L.	Speck		
Thomas W	Stephenson		
Ray	Stevens		
C.E.	Stone		
C. Wayne	Sutherland Jr.		
Thomas	Taylor		
Patricia M.	Thomas		
Carolyn	Thompson		
Michael L.	Thompson		
William & Molly	Tilson		
S. Morris	Trimmer		
Alan	Tuck		
Polly	Turner		
Mike	Underwood		
Susan	VanFleet		
Jill	Van-Moore		
Pauline	Vaughan		
C. M.	Vernon, Jr.		
Barbara	Walsh		
Dan	Walz		
Martin	Wegbreit		
Trina	Welsheimer		
Vicky	West		
Keith	Westbrook		
Susan	Westbrook		
Elliot	Wheeler		

* An additional 74 private citizens submitted comments during the Scoping process. These citizens chose to remain anomymous or their signatures were not legible.

Appendix F
Agency Scoping Comments

The following provides a summary of the scoping comments received from federal, state and local agencies and governments and the italicized text discusses the manner in which the comments have been addressed.

1.1 Federal Agency Comments

The following are scoping comments from federal agencies.

1.1.1 National Park Service

The National Park Service submitted the following comments in their letter, dated February 12, 2004:

1. I-81 currently intersects the Appalachian National Scenic Trail in two locations in Virginia, near Daleville and Groseclose interchanges. The Trail is a unit of the National Park System and is administered by the National Park Service in cooperation with the USDA Forest Service.

The Tier 1 EIS will include an evaluation of the potential impacts of the improvement concepts on Section 4(f) properties and identify whether those impacts could have a bearing on the location decision. The Tier 1 EIS will also include a preliminary determination as to whether there are prudent and feasible alternative improvement concepts that avoid the use of Section 4(f) properties. This determination shall consist of possible planning to minimize harm to the extent that the level of information included in the Tier 1 EIS will allow and to not preclude opportunities to minimize harm at subsequent stages. If a "Build" Improvement Concept is selected in Tier 1, specific mitigation measures for impacts to Section 4(f) properties would be developed during the Tier 2 process when the design of the improvement concepts are further advanced.

2. As a result of intermittent meetings during the last five years between NPS, VDOT and FHWA, it is clear that the expansion of I-81 will have some effect on the Appalachian Trail. As a result, NPS would like to request that FHWA provide NPS with cooperating agency status for the Tier I EIS.

On January 8, 2004, the FHWA requested the National Park Service to become a cooperating agency.

1.1.2 U.S. Department of the Interior, Fish and Wildlife Service

The U.S. Department of the Interior, Fish and Wildlife Service submitted the following comments in their letter, dated December 12, 2003:

1. The Service recommends the inclusion of a wide array of alternatives for this project.

A range of improvement concepts, including highway, rail, tolling and non-tolling concepts, will be developed in the corridor and in areas for potential roadway realignment, based upon existing and future transportation deficiencies and needs. Potential rail corridor improvement concepts will be evaluated within the existing corridor as well as a potential new rail location along the corridor. A preliminary screening will be conducted to make sure the improvement concepts address the purpose and need of the corridor.

2. Contact the appropriate state agency to determine coordination requirements for potential impacts to species protected under the Virginia Endangered Species Act and the Virginia Endangered Plant and Insect Species Act.

Informal consultation with federal and state resource agencies will be undertaken during the threatened and endangered species evaluation in Tier 1 and this coordination will be documented in the Tier 1 EIS. Information collected on threatened and endangered species and/or critical habitat will be used for agency coordination. It is assumed that the selected improvement concepts are sufficiently broad in those areas with proposed and/or designated listed species and/or habitat that they are not likely to result in a jeopardy opinion. If a "Build" Improvement Concept is selected in Tier 1, any necessary additional agency coordination beyond Tier 1 would occur during Tier 2.

3. The Service recommends FHWA and VDOT work closely with us to enhance and recover federally listed and endangered species populations within the roadway corridor.

This issue is similar to the issue in the previous bullet and the same response applies.

4. The Service strongly recommends that the enhancement of fish and wildlife resources be made an intricate part of this study and the overall project. Opportunities to enhance fish and wildlife resources throughout the corridor include the protection and enhancement of large blocks of natural habitat, provision of wildlife passageways, and stream improvements through the retrofitting of existing bridges and properly designing new structures.

Potential impacts to terrestrial communities as a result of fragmentation will also be qualitatively described in the Tier 1 EIS. If a "Build" Improvement Concept is selected in Tier 1, opportunities to enhance fish and wildlife resources, such as with wildlife crossings, for example, are more

appropriately addressed in Tier 2 because they require advancing the design beyond the conceptual engineering that will be performed in Tier 1.

1.1.3 U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency submitted the following comments in their letter, dated December 19, 2003:

1. Because of the magnitude of this project (over 330 miles of interstate highway), EPA concurs with the use of a tiered EIS to study this project. EPA understands the outcome of the first tier document will be an identification of the traffic problem(s) now and in the future, where the problem spots are located and a list of approaches to deal with them. EPA understands that increased use of rail freight to help mitigate truck traffic concerns will be part of the tier 1 document.

Comment noted.

The U.S. Environmental Protection Agency also submitted the following comments in their e-mail, dated February 5, 2004:

1. A corridor should be established that is sufficiently wide to capture known environmental features and is wide enough to allow flexibility if a particular improvement concept is selected for the corridor. Two scales of corridors may be appropriate, a fixed width (*e.g.*, 500 to 5,000 feet) that incorporates the likely location of potential physical improvements, and a wider corridor (*e.g.*, two counties wide on either side, or wider) that identifies sensitive resources and other potentially important features that may be affected directly, or indirectly, or influence the selection of an improvement concept.

The first level screening process for the improvement concepts will, among other evaluation criteria, consider key environmental resources, based on readily available GIS data or mapping generally within two miles to five miles of either side of the I-81 corridor. For improvement concepts on new location, the first level screening process will consider these environmental resources beyond this range, if necessary.

Some initial improvement concepts will be eliminated from consideration at this screening, while the others will advance to the next level of development. A second level screening process will then occur in which these improvement concepts are evaluated using more refined transportation, cost, and environmental evaluation criteria. The results of the second level analysis will determine the improvement concepts that are carried forward in the Tier 1 EIS. The Tier 1 EIS will include a discussion of the first level and second level screening processes.

For those improvement concepts that are carried forward, the Tier 1 EIS will include graphics, at a scale of 1 inch = 1 mile, that depict the environmental resources along the I-81 corridor. However, the Tier 1 EIS will be limited to reporting the direct and indirect impacts from the improvement concepts within the boundaries of the study area. The boundaries of the study area generally extend 500 feet on either side of the I-81 edge of pavement, except for the study area for cultural resources, which will

extend 1,000 feet from either side of the I-81 edge of pavement. The study area would also be 1,000 feet wide for any sections of roadway on new location.

The study will also involve a number of existing rail corridors that could be improved to help divert truck traffic from I-81. The study area will extend 500 feet from the centerline of these rail rights-of-way, except for the study area for cultural resources, which will extend 1,000 feet from the centerline of the rail rights-of-way.

2. If specific areas are identified for improvement in the Tier 1 document (particularly new alignments or right-of-way expansions), or are known to be under consideration for improvement from other studies (for example, the I-81/I-77 interchange), then the environmental information in the Tier 1 document should be more detailed at these locations. For example, instead of relying on the National Wetland Inventory (NWI) for wetlands information in these areas, more detailed wetlands information should be provided. The same may be true for other issues as well, such as low income and minority populations or historic resources. The decision to develop the more detailed information in Tier 1 should be based on the strength of the need for a particular improvement, the likelihood of a particular improvement being implemented, and the likelihood that sensitive resources will be in the area.

As discussed in the previous response, the screening analyses for the study will consider key environmental resources as part of the evaluation of the improvement concepts. However, the level of environmental information that will be generated for this Tier 1 EIS will be less than the level of environmental information that is typically included in a traditional (Tier 2) EIS because the types of corridor-wide decisions that need to be made in Tier1 do not require information to the same level of detail. Generally, the information in the Tier 1 EIS on environmental resources will be based on GIS data or mapping, agency input, and other data sources. However, in some cases, there will be limited field reconnaissance to verify or refine the accuracy of the GIS or aerial photography information. Site-specific issues and physical impacts would be addressed during Tier 2, if a "Build" Improvement Concept is selected in Tier 1.

3. The Tier 1 document should include corridor-wide (*e.g.*, 500 to 5,000 feet) mapping of spatial resources (including area and point data). For example, NWI, hydric soils and prime farmland soils, drainage from 1:24,000 USGS maps (available digitally statewide), and other significant information should be mapped in this corridor. The GIS database should be structured so that total area of potential impact or the total number of stream crossings etc. can be tabulated for the entire corridor and for sections of the corridor. The location of state and federal Scenic Rivers, state and federal parks and forests within the narrow corridor and the larger study area should be identified. Specific sensitive areas, such as trail crossings, major bridges, bridges over scenic rivers, potential Section 4 (f) and Section 6 (f) sites should be identified and tabulated.

The Tier 1 EIS will include graphics, at a scale of 1 inch = 1 mile, that depict the environmental resources along the I-81 corridor. The environmental resources to be studied include, but are not necessarily limited to, the following:

- *Historic properties and archeological sites;*

- *Threatened or endangered species or their critical habitat;*
- *Parks, recreational areas and open space easements;*
- *Farmland and agricultural/forestal districts;*
- *Social and economic considerations;*
- *Land use;*
- *Wetlands and water resources;*
- *Visual resources; and*
- *Air quality and noise impacts.*

Specific resources that will be studied include NWI wetlands, hydric soils, farmland soils, watersheds, Wild and Scenic Rivers, federal and state parklands, Appalachian Trail crossings, and wildlife and waterfowl refuges. The Tier 1 EIS will include an evaluation of the potential impacts of the improvement concepts on Section 4(f) and Section 6(f) properties in the study area (the boundaries of which were previously defined above) and will identify whether those impacts could have a bearing on the location decision.

The Tier 1 Draft EIS will generally report on the potential impacts to environmental resources on a corridor-wide basis. However, as listed in the Process Streamlining Agreement Between the Virginia Department of Transportation and the Federal Highway Administration on the Interstate 81 Corridor National Environmental Policy Act Process, one of the Tier 1 decisions to be made is the type of Tier 2 NEPA documents that would be required if a "Build" Improvement Concept is selected in Tier 1.

Following the Tier 1 Draft EIS, if a "Build" Improvement Concept is selected, the corridor would be divided into sections with logical termini and independent utility, based upon transportation, engineering, and environmental data. For sections of the corridor that have logical termini and independent utility and have top priority for construction, there would be a determination as to whether any sections can complete the full NEPA process during Tier 1. Depending on the results, the Tier 1 Final EIS could, therefore, potentially report the environmental impacts from the improvement concepts within specific sections of the corridor.Other sections of the corridor would require Tier 2 NEPA documents. The level of any Tier 2 NEPA document would depend on what the proposed project entails.

4. The Tier 1 document should identify potential alternative routes and evaluate impacts to these routes, if truck traffic is diverted from I-81 because of freight diversion or tolling. The Tier 1 study should identify if these impacts extend into other parts of the state, or other states. This Tier 1 study should identify, to the extent feasible, the secondary effects of diverted truck or other traffic and methods to mitigate those potential impacts.

The current scope of the traffic analysis for the I-81 Corridor Improvement Study defines the traffic study area as the I-81 corridor including I-81's interchanges with cross streets. Route 11, which is parallel to I-81 for its entire length in Virginia, is also in the traffic study area. As part of the traffic analysis, traffic volumes that divert to Route 11 to avoid tolls, as well as any potential roadway improvements along Route 11 that may result from these changes in traffic volumes would be determined. Traffic volumes that divert to other roadways beyond the current traffic study area to

avoid tolls will also be quantified, but any potential roadway improvements that would be required as a result of the diverted traffic to these roadways would be studied separately as part of the ongoing statewide transportation planning process. These potential roadway improvements would be developed as independent design and construction projects. It is, therefore, not necessary to expand the traffic study area for the I-81 Corridor Improvement Study beyond its current definition.

The analysis of future traffic conditions will determine the levels of service on the roadways in the currently-defined traffic study area and the general effects on safety, based upon estimates of vehicle miles travelled and current highway accident ratess.

5. The Tier 1 document should have a section that specially addresses environmentally sensitive areas, problem areas and areas of uncertainty. The goal is to alert decision makers, to the extent feasible, of known environmental issues, hazards and roadblocks as well as areas where uncertainty exists that may affect the outcome of Tier 1 identified projects. Sections of the corridor should be ranked based on environmental or other sensitivity or uncertainty.

The responses to the previous bullets discuss the approach that will be taken in Tier 1 to address these issues.

6. The Tier 1 document should have a Secondary and Cumulative Effects section. This section should address potential traffic impacts from truck diversions, potential induced growth impacts from adding highway capacity (particularly around cities and towns), potential changes in interstate traffic patterns and commerce movement, and potential changes in markets for Virginia's natural resources from improving access to rural areas or increasing the costs of these goods from the implementation of tolls. This section should identify all other highway improvements in the study area and identify potential cumulative effects of each. This section should identify all other major, known, or reasonably foreseeable actions in the larger study area that may affect the environment and/or have cumulative effects with the 1-81 improvements.

   As previously stated, as part of the traffic analysis, traffic volumes that divert to Route 11 to avoid tolls will be determined. Any potential roadway improvements along Route 11 that may result from these changes in traffic volumes will be determined as well. Traffic volumes that divert to other roadways beyond the current traffic study area to avoid tolls will also be quantified, but any potential roadway improvements that would be required as a result of the diverted traffic to these roadways would be studied separately as part of the ongoing statewide transportation planning process. These potential roadway improvements would be developed as independent design and construction projects.

   City and County officials are responsible for control of land use in Virginia, primarily through local and county comprehensive plans. The Land Use chapter of the Tier 1 EIS will assess the general consistency of the improvement concepts with the comprehensive plans adopted for the area and (if applicable) other plans used in the development of the transportation plans for metropolitan areas. Where possible, the distinction between planned and unplanned growth will be identified based on coordination with local governments and/or Planning District Commissions.

The economic analysis in the Tier 1 EIS, in conjunction with the toll study and freight diversion projections, will evaluate the costs and benefits to the freight industry that may ensue from the improvement concepts.

The Secondary and Cumulative Impact chapters in the Tier 1 EIS will identify past, present, and reasonably foreseeable future actions based primarily on:

- *VDOT information on previous, ongoing, and foreseeable roadway projects in the study area.*
- *Assumptions on the timing/phasing of future roadway corridor improvements based on coordination with VDOT districts.*
- *Assumptions on improvements to I-81 outside Virginia based on coordination with Tennessee DOT and West Virginia DOT.*
- *Previous coordination (correspondence, phone conversations, and meetings) with local governments about their previous, ongoing, and foreseeable projects including land development and infrastructure projects.*

7. It is not clear how the freight diversion study, if limited to Virginia, as this study appears to be, will help identify rail corridors that could used to divert truck traffic from I-81. The major rail corridor in the study area is part of an interstate shipping corridor from the Gulf Coast to New England. How will freight be transferred from truck to rail? Will this be done at the state line then transferred back to trucks at the other end of the state? Is this concept for intrastate shipping only? Will the Commonwealth Transportation Board (CTB) adopt the Tier 1 document and, thus, each of the specific elements in it, or can the CTB action wait until more specific and thus more predictable projects are studied in Tier 2?

Previous studies commissioned by the Commonwealth of Virginia have already identified the rail lines that provide an alternative mode for freight movements in the I-81 corridor. The Norfolk Southern Railroad operates a rail line running parallel to the I-81 corridor from the Tennessee state line to the West Virginia state line (the Shenandoah Route). A second line (the Piedmont Route) connecting north to the Washington, DC metropolitan area and into Hagerstown, Maryland, acts as a major north-south connection for freight.

Freight traffic can be separated into three distinct segments. Inbound traffic generally begins in a market region (i.e., a Business Economic Area (BEA)) outside Virginia and ends in a market region (BEA) inside Virginia. A Business Economic Area refers to a group of counties in an economically contiguous region as determined by the Bureau of Economic Analysis. Frequently, the boundaries of Business Economic Area cross state lines. Outbound traffic generally begins in a BEA inside Virginia and ends in a BEA outside Virginia. Through traffic begins in a BEA outside Virginia, moves through the state without in-state processing, storage, or handling, and ends in a BEA outside Virginia.

To improve the competitiveness of rail in comparison to freight trucking, intermodal transfer facilities (where freight is transferred from truck to rail and vice versa) must be available at both the freight origin and the freight destination. Since BEAs recognize economics rather than political boundaries, intermodal transfer facilities are unlikely to be located at state lines. It should be noted that the potential rail improvement concepts include enhanced access to intermodal facilities.

The economies of long-distance rail movement have to overcome the costs of transfer between the rail and truck (twice) and local truck pick-up and delivery. Among other factors, hauls of at least 500 miles are necessary before the economies of rail intermodal transport are realized. Diversion of freight along the I-81 corridor would, therefore, apply to origin and destination market regions that are separated by more than 500 miles. Since the I-81 corridor is 325 miles long, the concept of rail intermodal services would be for interstate shipping, rather than intrastate shipping.

Regarding the question about the timing of Commonwealth Transportation Board (CTB) action, the end result of the Tier 1 NEPA process is that the CTB and FHWA will make decisions on which improvement concept, if any, merits further study.

1.1.4 U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers submitted the following comments in their letter, dated December 19, 2003:

1. The Corps concurs with the decision to develop a tiered EIS. We have no further comments at this time, and request a copy of the draft P&N when it has been developed.

Comment noted. A review of the study will be conducted through the Partnering Process (with the U.S. Army Corps of Engineers).

1.2 State Agency Comments

The following are summaries of scoping comments from Virginia state agencies.

1.2.1 Virginia Department of Rail and Public Transportation

The Virginia Department of Rail and Public Transportation submitted the following comments in their comment letter, dated January 14, 2004:

1. Why wasn't the Piedmont route included as this was the corridor presented to the CTB at their January meeting?

The Piedmont Route will be included in the analysis of the rail improvement concepts in the Tier 1 study.

1.2.2 Virginia Department of Environmental Quality, Office of Wetlands and Water Projection and Compliance

The Virginia Department of Environmental Quality, Office of Wetlands and Water Projection and Compliance submitted the following comments in their letter, dated February 20, 2004:

1. The Environmental Impact Statement should explore the potential for the most feasible alternative that also avoids and minimizes potential direct and indirect impacts to wetlands and streams to the greatest extent practicable.

The Tier 1 analysis will evaluate general concepts to avoid or minimize harm to wetlands and streams and identify general wetland and stream mitigation concepts.

2. Any impacts from grading, clearing, or excavating more than one acre of land will require a stormwater permit for construction. The proponent should coordinate stormwater permitting issues with the DEQ Regional Office Storm Water Permitting staff at the appropriate regional office.

If a "Build" Improvement Concept is selected in Tier 1, permitting procedures would be complied with in Tier 2.

3. While considering the impact due to grading, clearing, or excavating, the following two State regulations are to be kept in view: 1. Fugitive dust & emission control (9 VAC 5-50-60 et seq.); and 2. Open Burning (9 VAC 5-40-5600 et seq.).

A brief comparative statement about construction impacts of the improvement concepts will be included in the Tier 1 EIS. This will include temporary impacts to air quality. If a "Build" Improvement Concept is selected in Tier 1, more detail would be included in Tier 2.

4. All precautions are to be taken to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) during construction phase in the ozone non-attainment and maintenance areas.

This issue is similar to the issue in the previous bullet and the same response applies.

1.2.3 Virginia Department of Historic Resources

The Virginia Department of Historic Resources submitted the following comments in their letter, dated February 6, 2004:

1. There are 11 known National Historic Landmarks in or near the I-81 corridor (listed in letter). Please take them into consideration during your project planning.

Comment noted. The Tier 1 EIS will have maps and tables that list the historic sites along the corridor and a summary of the potential for the improvement concepts to affect historic properties. This information will be used to help make recommendations on the corridor-wide decisions that need to be made in Tier 1.

2. When researching historic assets in the I-81 corridor, we recommend referencing not only the GIS information in the Data Sharing System but also visiting our archives to review our hard copy site maps and survey forms. This ensures your receiving the latest, most complete information.

Because of the limitations in the Data Sharing System, the study quadrangle maps will be reviewed against the file maps at Virginia Department of Historic Resources. The files at the Virginia Department of Historic Resources will also be checked to insure that eligible resources are not missed.

3. The Shenandoah Valley Battlefield Foundation has expressed its concern about the proposed undertaking and its potential to adversely affect Civil War battlefields located in the valley. It would be prudent to reference the mapping and reports produced by the National Park Service's Civil War Sites Advisory Commission.

The study will consider all Civil War battlefields listed in the Civil War Sites Advisory Commission Report on the Nation's Civil War Battlefields, as well as other potentially significant battlefields identified through interviews with regional and local, avocational or professional historians, and review of historic maps and documents and secondary sources.

1.2.4 Virginia Department of Conservation and Recreation

The Virginia Department of Conservation and Recreation (DCR) submitted the following comment in their letter, dated February 20, 2004:

1. DCR recommends a 300-meter buffer be maintained between the significant community and any land disturbing activities proposed for the project. As more detailed information becomes available for the project, DCR will provide additional recommendations for natural heritage resources.

If a "Build" Improvement Concept is selected in Tier 1, site-specific impact and mitigation analyses would be performed in Tier 2.

1.3 Regional and Local Agency Comments

The following are scoping comments from Virginia regional and local agencies.

1.3.1 Blacksburg, Christiansburg, Montgomery Area Metropolitan Planning Organization

The Blacksburg, Christiansburg, Montgomery Area Metropolitan Planning Organization submitted the following comments in their letter, dated February 13, 2004:

1. Any proposal decision should not be made until the environmental process is complete.

The NEPA process and the PPTA process are independent processes, each with a different purpose. The PPTA is a state law with the purpose of selecting a contractor. The NEPA process is a federal process that will allow informed decisions on solving the problems of the I-81 corridor. The PPTA process will not influence the alternatives analysis required by NEPA or decisions on the improvement concepts.

2. The future Smart Road interchange should be evaluated and incorporated into the design and construction of any improvements.

The traffic analysis will consider fully funded capital improvements in VDOT's Six Year Improvement Plan and capital improvements in the Long Range Transportation Plans. Specific elements of the improvement concepts, such as additional interchanges, are more appropriately included in Tier 2 because they involve advancing the design beyond the conceptual engineering that will be performed in Tier 1.

3. Neither proposal addresses both passenger (TransDominion) and freight service along the entire I-81 corridor. This may require a more detailed study and the consideration of possible improvements in adjacent states.

The traffic analysis will consider the needs of both passenger and freight corridor users. Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors). The issue of examining rail improvement concepts in adjacent states is discussed in Section 2.3.2.

4. There is significant vehicular interaction within the Blacksburg MSA (Blacksburg, Christiansburg, and Radford) and between the adjoining Roanoke MSA. Any toll policies should be structured to exempt this local traffic.

This is outside the scope of the Tier 1 EIS. However, VDOT would have to develop a plan outlining how it will ensure that the interests of local, regional, and interstate travelers, as it relates to tolling, are included as part of the public review processes.

5. Any toll facilities should be located where they will not have an adverse impact on local highways. For example, the Fluor proposal locates a toll facility at mile marker 116 between Route 8 interchange (exit 114) and the Route 11/460 interchange (exit 118). The Fluor proposal estimates a 45% toll bypass rate for long distance traffic thereby dumping significant traffic onto the local streets of Christiansburg.

If a "Build" Improvement Concept is selected in Tier 1, this issue would be more appropriately addressed in Tier 2 when the design of the improvement concepts have further advanced.

6. Any proposal requiring more right-of-way than what was identified in VDOT's 1998 concept study may impact AFDs in Montgomery County.

The Tier 1 EIS would estimate the number of acres of agricultural/forestal districts that may be affected in the general corridor and that would potentially be converted to other uses. If a "Build" Improvement Concept is selected in Tier 1, measures to avoid, minimize, and mitigate impacts to these resources would be developed in Tier 2.

1.3.2 Town of Wytheville

The Town of Wytheville submitted the following comments in their letter, dated January 14, 2004:

1. Whichever proposal is considered should contain provisions for both passenger and rail service throughout Virginia.

The traffic analysis will consider the needs of both passenger and freight corridor users. Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors).

2. Virginia's Interstate 81 corridor is a serious safety issue, and improvements are imperative. Given that VDOT and both contractors are considering the separation of interstates, we think that any separation should be as minimal as possible with convenient ramps and connections between the interstates and proper signage, all of which will not devastate our tourism traffic. VDOT should also consider the impact Interstate 74 will have on both Interstate 81 and Interstate 77.

The I-81 Corridor Improvement Study will identify deficiencies throughout the corridor, develop a range of potential solutions, and evaluate those solutions' ability to meet the study's Purpose and Need.

The traffic analysis will consider fully funded capital improvements in VDOT's Six Year Improvement Plan and capital improvements in the Long Range Transportation Plans. Since proposed I-74 is not included in anyof these plans, it will not be included as part of the traffic analysis. If a "Build" Improvement Concept is selected in Tier 1, the status of I-74 would be reexamined and reconsidered, if necessary, during Tier 2.

3. The project expenses and the amount of indebtedness incurred by the state should be held to the lowest point possible.

This issue is outside the scope of the Tier 1 EIS. As part of the toll pilot project process, VDOT would have to develop a financial plan.

4. The only alternative likely to make the needed improvements in a timely fashion will be through the PPTA.

The NEPA process and the PPTA process are independent processes, each with a different purpose. The PPTA is a state law with the purpose of selecting a contractor. The NEPA process is a federal process that will provide information for decisions on solving the problems of the I-81 corridor. The PPTA process will not influence the alternatives analysis required by NEPA or decisions on the improvement concepts. If a "Build" Improvement Concept is selected in Tier 1, timetables for construction would be considered in Tier 2.

1.3.3 The City of Winchester

The City of Winchester submitted the following comments in their letter, dated October 30, 2003:

1. The two proposals under consideration by VDOT are not consistent with local government adopted comprehensive plans.

The Tier 1 EIS will assess the general consistency of the improvement concepts with the comprehensive plans adopted for the area and (if applicable) other plans used in the development of the transportation plans for metropolitan areas.

2. The *Northeast-Southwest-Midwest Corridor Marketing Study Examining the Potential to Divert Highway Traffic from Interstate 81 to Rail Intermodal Movement*, completed in December 2003 for the Virginia Department of Rail and Public Transportation (VDRPT) found both shippers and carriers are willing to shift a portion of their traffic to rail if their cost and service demands are routinely satisfied.

The economic analysis in the Tier 1 EIS, in conjunction with the toll study and freight diversion projections, will evaluate the costs and benefits to the freight industry that may ensue from the improvement concepts.

3. The VDRPT study found that to meet these demands a rail system in the I-81 corridor must include a) an intermodal technology accommodating the current mix of highway trailers; b) rail lines capable of providing a service matching the standard service offered by trucks, and c) a significant economic incentive to shippers.

Comment noted.

4. Proper inclusion of a freight/passenger rail component in a comprehensive surface transportation policy assures notable reduction in needed interstate lane capacity and associated design and construction costs.

The potential improvement concepts include rail improvements.

5. The Northern Shenandoah Valley Regional Commission calls upon the federal, state and local government officials along the Interstate 81 corridor from Harrisburg, Pennsylvania, to Chattanooga, Tennessee, to work cooperatively with the rail companies to develop an intermodal railroad operation.

Comment noted. The issue of examining rail improvement concepts in adjacent states is discussed in Section 2.3.2.

1.3.4 The Town of Abingdon Department of Public Works

The Town of Abingdon Department of Public Works, submitted the following comments in their letter dated February 10, 2004:

1. The current project on I-81 in Abingdon, the Exit 17 Interchange Improvements, needs to continue to move into the construction stage. This project must not be allowed to fall victim to delay due to the NEPA process on the larger full-length I-81 project.

The Exit 17 Interchange improvement project is an active project in VDOT's Six Year Improvement Plan, however, thus far, it is only budgeted for preliminary engineering and purchase of right-of-way.

1.3.5 Northern Shenandoah Valley Regional Commission

The Northern Shenandoah Regional Commission submitted the following comments in their letter, dated February 5, 2004:

1. There will need to be a detailed accounting of how a rail component will help or not be effective in diverting trucks off of I-81.

The scope of the Tier 1 study includes an analysis of the effects of freight diversion options.

2. How well lane configurations, interchange locations, and connections to the local highway network are handled will determine whether the proposed improvements complement and help local development or conflict with local development.

The Tier 1 EIS will identify the general areas in the corridor where the transportation investment from the improvement concepts supports or affects public or private economic development plans.

3. Air quality is becoming a more critical issue in the Valley - will proposed improvements help it or make it worse?

The Tier 1 EIS will include a comparison of the improvement concepts' corridor-wide emissions (particulate matter and ozone precursors). The Tier 1 EIS will also include documentation of the current air quality attainment status of the study area and discuss the relationship of the study to the State Implementation Plan (SIP) for air quality. If a "Build" Improvement Concept is selected in Tier 1,the assessment of ozone and fine particulate impacts from the improvement concepts in terms of conformity with the SIP would be assessed in detail during Tier 2. Any individual projects would have to comform to the National Ambient Air Quality Standards before they could be implemented.

4. It is going to be very critical for VDOT to ensure that local level plans are checked carefully to determine long-range development in the region.

Traffic growth rates will be based on the most recent land use and socioeconomic data from the Metropolitan Planning Organizations in the corridor, input from state and local officials about future land use changes along the corridor, statewide and regional economic forecasts, and information developed for the statewide model. It is important to note that the horizon year for the traffic analysis is 2035, which is beyond the horizon year for local comprehensive plans.

1.3.6 Montgomery County Board of Supervisors

The Montgomery County Board of Supervisors submitted the following comments in their letter, dated January 13, 2004:

1. The Board of Supervisors of the County of Montgomery, Virginia supports looking into the concept of rail service as a part of the Environmental Study being conducted by VDOT.

Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors).

1.3.7 Mount Rogers Planning District Commission

The Mount Rogers Planning District Commission submitted the following comments in their letter, dated October 2, 2003:

1. Much more emphasis needs to be placed on rail alternative for Virginia and the eastern United States.

Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors). The issue of examining rail improvement concepts in adjacent states is discussed in Section 2.3.2.

2. The Commission opposes tolls because the regional median household income is 65 percent of the state median.

Toll policy/structure issues are discussed in Section 2.4.1.

1.3.8 Rockbridge County Board of Supervisors

The Rockbridge County Board of Supervisors submitted the following comments in their letters, dated March 24, 2003, July 14, 2003, and October 27, 2003.

1. Consider innovative concepts, such as the "truck-ferry" and "Steel Interstate", that have the potential to divert time-sensitive freight from trucks on I-81 to rail.

The improvement concepts will be developed to meet the study's Purpose and Need. Potential improvement concepts include rail improvements (including enhanced access to intermodal facilities and new rail corridors).

2. The Board of Supervisors of Rockbridge County Virginia does not support the detailed STAR and Fluor proposals for tolls and dedicated truck lanes on I-81.

The NEPA process and the PPTA process are independent processes, each with a different purpose. The PPTA is a state law with the purpose of selecting a contractor. The NEPA process is a federal process that will allow informed decisions on solving the problems of the I-81 corridor. The PPTA process will not influence the alternatives analysis required by NEPA or decisions on the improvement concepts. Improvement concepts that meet the study's Purpose and Need will be considered.

3. VDOT should call for alternative proposals, including rail and better use of I-81 that will move freight while creating the potential for timely and reliable passenger service through the entire region.

This issue is similar to the issue in the first comment. The same response applies.

4. The Board strongly urges VDOT to investigate and develop innovative alternative ways to correct the traffic problems on I-81 without the use of toll-funded road construction.

Potential improvement concepts include tolling and non-tolling strategies.

1.3.9 Win-Fred Metropolitan Planning Organization

The Win-Fred Metropolitan Planning Organization submitted the following comments in their comment letter dated February 18, 2004:

1. The *Northeast-Southwest-Midwest Corridor Marketing Study Examining the Potential to Divert Highway Traffic from Interstate 81 to Rail Intermodal Movement*, completed in December 2003 for the Virginia Department of Rail and Public Transportation (VDRPT) found both shippers and carriers are willing to shift a portion of their traffic to rail if their cost and service demands are routinely satisfied.

The economic analysis in the Tier 1 EIS, in conjunction with the toll study and freight diversion projections, will evaluate the costs and benefits to the freight industry that may ensue from the improvement concepts.